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GO-2000-279
letter file

400 Seventh Street, S.W.
Washington, D.C. 20590

DEC 29 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
PO Box 360
Jefferson City MO 65102

Dear Mr. Roberts:

This concerns your order in Case No. GO-2000-279, which involves the City of Fulton's petition for a finding under 49 CFR 192.150(b)(8) that 640 feet of the City's 15.5-mile, 8-inch steel transmission line is impracticable to design and construct to accommodate the passage of instrumented internal inspection devices. We have considered your order as a recommendation under 49 CFR 190.9 that we grant the City's petition.

According to the petition, the 640-foot section was relocated to accommodate the construction of a lake and minimize the risk of damage to the line. Bottom-out stopper fittings, which contain 90° elbows that impede the passage of internal inspection devices, were used instead of alternative relocation methods that involved shutting down the line. Because the line is the City's only source of gas, shutting it down would have caused an interruption of gas service to the City's 4000 customers and subsequent re-lighting difficulties.

We agree that under the circumstances it was impracticable to design and construct the 640-foot section to accommodate the passage of instrumented internal inspection devices. Therefore, the City's petition is granted.

Sincerely,

Richard B. Felder
Associate Administrator for Pipeline Safety

cc: Thomas C. Brady
Attorney, City of Fulton



CITY OF FULTON, MISSOURI

ROBERT W. CRAGHEAD
Mayor

4TH & MARKET STS., P.O. BOX 130, FULTON, MISSOURI 65251-0130
Telephone: (573) 642-6826 Fax: (573) 642-0200

October 15, 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Harry S Truman Building
301 W. High Street
Jefferson City, MO 65101

FILED²
OCT 15 1999
Missouri Public
Service Commission

RE: Case No. GO-2000- 279

Dear Mr. Roberts:

Enclosed for filing, please find an original and fourteen copies of the Petition for Approval. Please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you for your consideration in this matter.

Sincerely,

Timothy C. Brady
Attorney at Law for City of Fulton

cc: Office of Public Counsel

FILED²

OCT 15 1999

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the petition
of The City of Fulton, Missouri for
approval in accordance with
4 CSR 240-40.030(4)(HH)3., that it was
impracticable to construct an emergency
replacement to accommodate instrumented
internal inspection devices.

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Case No. GO-2000- 279

PETITION FOR APPROVAL

COMES NOW The City of Fulton, Missouri (hereinafter "the City"), by and through its
counsel, and for its application respectfully states as follows:

1. The City is a municipality organized and existing under the laws of the State of
Missouri. The City operates a transmission line and distribution system subject to the pipeline
safety jurisdiction of the Missouri Public Service Commission.

2. Correspondence, communications, and orders of the Commission in regard to this
Petition should be addressed to:

Ray Luhring
Superintendent of Utilities
PO Box 130
Fulton, Missouri 65251

Tim Brady
Attorney at Law
Brady & Crane LLC
411 Court St.
Fulton, Missouri 65251

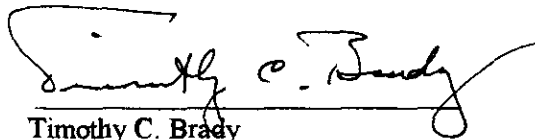
3. In accordance with 49 CFR Part 190.9, petitions for finding or approval, the City is filing a petition for approval in accordance with 4 CSR 240-40.030(4)(HH)3., which corresponds with 49 CFR Part 192.150(c). The City seeks Commission approval that it was impracticable to construct an emergency replacement in September 1999, in a manner that would accommodate instrumented internal inspection devices.
4. The City operates 15.5 miles of 8" steel transmission line which was installed in 1968 and currently operates at a maximum operating pressure (MOP) of 320 psig (17.5% SMYS). The City has no current plans to raise the maximum operating pressure (MOP) of this line. The maximum allowable operating pressure (MAOP) is currently 475 psig (26% SMYS). The line is the only feed for the City, with approximately 4,000 customers, including a power plant and brick manufacturing plant.
5. On September 17, 1999, this 8" steel main was hit by a contractor while building a lake. The line was well marked with signs across the property. No call to the One-Call System or the City was made to attempt to locate the line. The line pressure was lowered and a full encirclement welded split sleeve was installed as a repair, and service was restored with loss of only 13 customers. If the installation of the full encirclement sleeve had been successful, the line would have been able to accommodate an instrumented internal inspection device. Because of problems with installing the full encirclement sleeve, and other stress and damage imposed on the pipe in the area, a leak-free installation and permanent repair was not attainable.

6. To make permanent repairs, bottom-out line stoppers were installed and 640 ft. of 8" main was relocated and lowered around the location of the proposed lake. These repairs were started on September 20, 1999. The decision to install bottom-out stoppers was the only alternative since this line is the only feed for the 4,000 customers served by this line. Because this procedure installs two short-radius 90° elbows, making it impossible to accommodate the passage of an internal inspection device.
7. Other bottom-out fittings have been installed at 6 locations. This was done at 3 different sites, using 2 bottom-out fittings at each site. One site was due to line being hit during highway construction; which gas service was lost to the town of Fulton and 4,000 customers had to be re-lit. One site was for the removal of a metering station, the other relocation was to allow for a housing development. At each of these sites, short-radius 90° elbows were installed.
8. It was impracticable to design and construct the emergency relocation described herein, because of the following reasons:
 - a. This transmission line is the only supply to the City and could not be removed from service.
 - b. The transmission line has several other known obstructions already existing in the line that would not accommodate the passage of an instrumented internal inspection device.
 - c. There may be other unknown obstructions that were installed at the time of construction and during the 1970's.

- d. The other known and unknown obstructions would have to also be removed before the City's transmission line could accommodate the passage of an instrumented internal inspection device.

WHEREFORE, for the foregoing reasons, the City of Fulton respectfully requests that the Commission issue its Order of approval as set forth herein.

Respectfully submitted by,



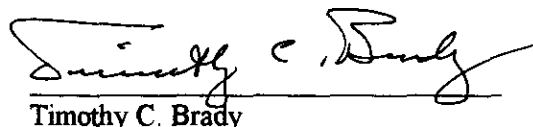
Timothy C. Brady

411 Court St.
Fulton, Missouri 65251
(573) 642-6631
Attorney for
The City of Fulton
Missouri Bar No.: 32388

VERIFICATION


STATE OF MISSOURI)
) ss
COUNTY OF CALLAWAY)

On the 15th day of October, 1999, before me appeared Timothy C. Brady, to me personally known, who, being by me first duly sworn, states that he is the attorney for the City of Fulton and acknowledged that he had read the above and foregoing document and believes that the allegations therein are true and correct to the best of his information, knowledge and belief, and that the above designated attorney is authorized to file said petition on behalf of the City of Fulton.

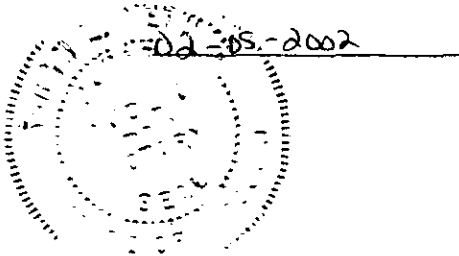


Timothy C. Brady

Subscribed and sworn to before me this 15th day of October, 1999.



Notary Public Robin L. Verwoys

My Commission expires:



Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing document was served on all parties of record in this proceeding the 15th day of October, 1999, by placing a copy of same in the United States Mail, first class postage prepaid and properly addressed, or hand delivering same.


Timothy C. Brady