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November 20, 2000

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: Case No. GS-2000-673

Dear Judge Roberts:

Enclosed for filing please find the original and eight copies of the Response to Staff Recommendations.

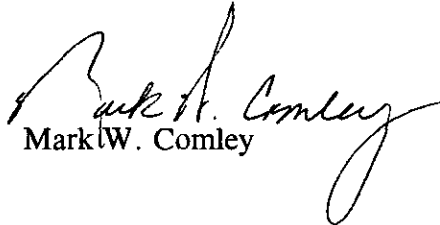
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel  
General Counsel's Office  
Michael C. Pendergast

**FILED<sup>2</sup>**

NOV 20 2000

Missouri Public  
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Laclede Gas Company,       )  
Regarding an Incident at 416 Boyce,       )  
Farmington, Missouri, on March 25, 2000    )

Case No. GS-2000-673

**FILED<sup>2</sup>**  
NOV 20 2000  
Missouri Public  
Service Commission

**RESPONSE TO STAFF RECOMMENDATIONS**

COMES NOW Laclede Gas Company ("Laclede" or "Company"), pursuant to the Commission's September 19, 2000 Order Directing Response in the above-captioned case, and submits its Response to the Staff Recommendations contained in the Gas Incident Report filed by Staff on September 7, 2000. In support thereof, Laclede states as follows:

**I.     Introduction**

On September 7, 2000, the Staff filed its Gas Incident Report detailing various recommendations developed by Staff in connection with an incident which occurred on March 25, 2000 at 416 Boyce Avenue, in Farmington, Missouri (hereinafter "Staff's Incident Report"). As a result of subsequent discussions between the Company and Staff, Laclede believes that all of the recommendations set forth in Staff's Incident Report have now been adequately addressed by the Company. The manner in which such matters have been resolved is discussed more fully below.

**II.    Response to Staff Recommendations**

**Staff Recommendation No. 1**

The Staff recommends that Laclede review and revise as necessary its procedures and processes of appropriate notification to designated Company personnel who

are responsible for contacting the Commission of a reportable incident. These procedures and policies should stipulate that even if there is a suspicion that an event is reportable, appropriate Company personnel should be provided the opportunity to make the distinction. Refresher training should be provided to all personnel, not just those involved with this incident, to make sure any Company personnel responsible for reporting an emergency situation is capable of making decisive, prompt decisions.

**Laclede's Response:**

The Company has revised its reporting procedures to emphasize that potential incidents of a reportable nature should be brought to the attention of the Company's Claims Department, even where there is only a suspicion that natural gas may be involved in the potential incident. The Company has and will continue to emphasize this point in its employee training process.

**Staff Recommendation No. 2**

The Staff recommends that Laclede review and revise as necessary its procedures for responding to, and acting upon a gas leak that is beyond routine action. Specifically, the early recognition of the hazards associated with the magnitude and extent of migration of escaping natural gas, and the complete venting and termination of escaping natural gas must be initiated in a timely manner that protects life and property. Procedures should include the necessity to have mechanical digging equipment readily accessible while working an emergency situation. Refresher training should be provided to all personnel, not just those involved with this incident, who would have the opportunity to respond to an emergency situation, in order that prompt actions are taken to make the area safe.

**Laclede's Response:**

On November 2, 2000, the Staff filed its Response to Laclede's Answer to the Complaint brought by Staff in connection with this incident. See Staff's Response, Case No. GC-2001-137. In that Response, Staff indicated that its recommendations in this case relating to the prompt and effective handling of emergency situations had already been adequately addressed by the terms of the Unanimous Stipulation and Agreement

filed by the Company, Staff and Office of the Public Counsel on November 2, 2000, in Case Nos. GC-2001-19 and GS-2000-525. (Staff's Response, p. 6). Accordingly, Laclede believes that the matters raised by this recommendation have been resolved.

**Staff Recommendation No. 3**

The Staff recommends that Laclede evaluate and revise as necessary its training methods to instruct personnel in the proper emergency response procedures to include the early recognition of a hazard, working in close proximity to a potentially hazardous site, and the fastest, safest and most efficient method for terminating the flow of natural gas in an emergency. Natural gas incidents, while unfortunate in occurrence, provide examples where lessons can be learned. Therefore, the circumstances of, and the problems encountered, in the March 25 incident should be incorporated into the training.

**Laclede's Response:**

On November 2, 2000, the Staff filed its Response to Laclede's Answer to the Complaint brought by Staff in connection with this incident. *See Staff's Response, Case No. GC-2001-137.* In that Response, Staff indicated that its recommendations in this case relating to the prompt and effective handling of emergency situations had already been adequately addressed by the terms of the Unanimous Stipulation and Agreement filed by the Company, Staff and Office of the Public Counsel on November 2, 2000, in Case Nos. GC-2001-19 and GS-2000-525. (Staff's Response, p. 6). Accordingly, Laclede believes that the matters raised by this recommendation have been resolved.

**Staff Recommendation No. 4**

The Staff recommends that Laclede be directed to file a response regarding each of the recommendations contained in this Case within 60 days of the filing of this report.

**Laclede's Response:**

This recommendation has been satisfied with the filing of this Response.

**Staff Recommendation No. 5**

The Staff recommends that the Office of General Counsel cause a complaint to be filed with the Commission regarding the violations noted in this Gas Incident Report.

**Laclede's Response:**

In view of the fact that Staff's other recommendations in this case have been fully addressed by the Company, Laclede believes that any need to pursue this matter further, whether in the form of a Staff Complaint or otherwise, has been eliminated. *See also* Laclede's October 12, 2000 Answer to Staff Complaint in Case No. GC-2001-137.

**WHEREFORE**, for the foregoing reasons, Laclede respectfully requests that any Order issued by the Commission in this case reflect the considerations set forth herein.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Michael C. Pendergast by P. AC". The signature is written over a horizontal line.

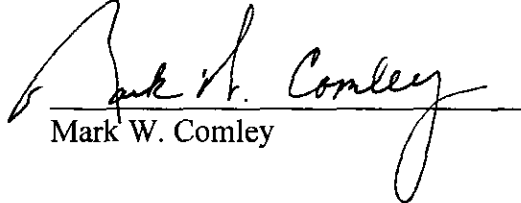
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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, on this 20<sup>th</sup> day of November, 2000 to:

Office of Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

General Counsel's Office  
Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

  
Mark W. Comley