

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

In the Matter of a Review of the Commission's  
Natural Gas Safety Rules

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**File No. GW-2020-0036**

**COMMENTS**

Summit Natural Gas of Missouri, Inc. ("Summit") submits its comments in consideration of revisions to the Missouri Public Service Commission's ("Commission") gas safety rules.

Summit notes that in 20 CSR 4240-40.030 Safety Standards—Transportation of Gas by Pipeline, § 3, Pipe Design, the proposed design factor is 0.32. This differs from the recently adopted changes to 49 C.F.R. 192.121 § C(iii)(2), which allows for a design factor of 0.4. Summit suggests that the proposed Missouri rule be revised to align with federal code. This will afford greater system design flexibility for gas utilities in the future and will assist Summit in achieving uniform design requirements across multiple service territories.

SNGMO appreciates the opportunity to submit responsive comments to the Commission regarding the Review of the Commission's Natural Gas Safety Rules. SNGMO may have additional comments once it has an opportunity to review the other responsive comments, and it will address all comments as allowed in Commission rules and procedures.

Dated this 16<sup>th</sup> day of September 2019.

Respectfully submitted,

By:

/s/ Matthew Kaply

Matthew Kaply

Senior Director of Regulatory Affairs

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