

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

In the Matter of the Establishment of a Working Case for the Review and Consideration of Amending the Commission’s Natural Gas Safety Rules.)
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) File No. GW-2022-0237
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INITIAL COMMENTS

Summit Natural Gas of Missouri, Inc. (“Summit”) submits its comments in consideration to the Missouri Public Service Commission’s (“Commission”) Order Opening a Working Case to Consider Amending the Commission’s Natural Gas Safety Rules which directs any stakeholders wishing to submit written comments regarding Staff’s proposed rule amendment. Summit recognizes these comments are being provided after the deadline and hopes the Commission will take these comments into account regardless of timing.

Summit has reviewed Staff’s proposed amendments to the Commission’s Natural Gas Safety rules as set out in Attachment A to Staff’s Motion to Establish Working Case (“Staff’s Motion”), which incorporates the Federal Pipeline Safety Standards amendments and provides further edits. SNGMO is in general support of the amendments.

Summit suggests a revision to Rule 20 CSR 4240-40.020.4.A(1)(C) so that the definition of the Missouri reportable incidents corresponds or aligns with the recent amendment to the “Federal incident” reporting thresholds reflected in 20 CSR 4240-40.020.1.D(1)(B) & (C). Summit believes the property damage threshold for Missouri Incidents reported to the Commission should be amended to be consistent with the recent increase in the threshold for estimated property damage under the definition of “Federal incident.” As presented on page 1 of 37 in Attachment 1 to the Staff’s Motion, the definition of “Federal incident” has been modified to increase the threshold for estimated property damage from \$50,000 to \$122,000 to reflect

inflation. However, Staff's Motion does not similarly seek to amend the property damage threshold of "Missouri Incidents" to be reported under 20 CSR 4240-40.020.4.A(1)(C) to reflect inflation. Summit recommends that the Missouri incident threshold should be similarly increased from \$10,000 to \$30,000 due to the fact that many of the State reportable incidents that would have estimated property damage between \$10,000 (existing threshold) and \$30,000 (proposed) are driven by labor costs that rise with inflation.

Summit appreciates the opportunity to submit these comments and looks forward to providing further comment as part of this proceeding.

Dated this 2nd day of May 2022.

Respectfully submitted,

/s/Stan Given
Stan Given
Director of Pipeline Safety
Summit Natural Gas of Missouri, Inc.