

LACLEDE GAS COMPANY
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101

AREA CODE 314
342-0532

MICHAEL C. PENDERGAST
ASSISTANT VICE PRESIDENT
ASSOCIATE GENERAL COUNSEL

November 2, 2000

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
P. O. Box 360
Jefferson City, MO 65102-0360

FILED²

NOV 2 2000

Missouri Public
Service Commission

RE: Case No. GS-2000-525
Case No. GC-2001-19

Dear Mr. Roberts:

On behalf of Laclede Gas Company, the Staff of the Missouri Public Service Commission and the Office of the Public Counsel, enclosed for filing, please find the original and eight copies of the Unanimous Stipulation and Agreement in the above-referenced cases.

Thank you for your consideration in this matter.

Sincerely,



Michael C. Pendergast

MCP:kz

cc: All parties of record

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

In the Matter of Laclede Gas Company,)
Regarding an Incident at 1904 Birchwood Drive,)
Barnhart, Missouri, on February 7, 2000)

Case No. GS-2000-525

The Staff of the Missouri Public Service)
Commission,)

Complainant,)

Case No. GC-2001-19

v.)

Laclede Gas Company)

Respondent.)

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Missouri Public
Service Commission

UNANIMOUS STIPULATION AND AGREEMENT

COME NOW Laclede Gas Company ("Laclede" or "Company"), the Staff of the Missouri Public Service Commission ("Staff"), and the Office of the Public Counsel ("Public Counsel") and represent to the Missouri Public Service Commission ("Commission") that they have reached a Unanimous Stipulation and Agreement (hereinafter "Stipulation") in the above-captioned cases. For their Stipulation, the parties state as follows:

1. On July 11, 2000, the Staff filed a Complaint against Laclede in connection with an incident which occurred on February 7, 2000 at 1904 Birchwood Drive in Barnhart, Missouri. A Laclede employee, Mr. Kenneth Ferguson, lost his life as a result of injuries received during the incident when the home located at that address exploded. At the time of the explosion, Mr. Ferguson and a number of other Laclede

employees were working to squeeze off the flow of gas in a four-inch plastic main that had been ruptured by a contractor installing telecommunication facilities for Southwestern Bell Telephone Company. The rupture occurred when the contractor, A-B Contracting, Inc., pierced the four-inch plastic natural gas main with a drill bit. The drill bit was on the end of a series of boring sticks attached to a horizontal boring machine that was being used by the contractor to install the telecommunications facilities. The contractor hit the main even though its exact location had been correctly marked.

2. In its Complaint, the Staff noted that the "probable cause of the incident was the third-party damage to the Company's underground facilities by A-B Contracting." The Staff further noted that this damage occurred because the contractor "had failed to vigilantly monitor and plot the drill bit progress and location in relation to the 4-inch diameter PE natural gas main, and that the incident could have been prevented if these precautions had been taken." The Staff also alleged in its Complaint that Laclede had failed to comply with 4 CSR 240-40.030 (14)(C), which states, in part, that "Class 1 leaks ... shall require immediate corrective action which shall provide for public safety and protect property."

3. On July 11, 2000, the Staff filed its Gas Incident Report in Case No. GS-2000-525, in which it made various recommendations that had been developed by Staff as a result of its investigation of the Barnhart incident. Staff's recommendations focused on steps aimed at preventing or reducing third-party damage to the Company's facilities as well as measures for enhancing the Company's response to situations where such damage has resulted in the escape and migration of natural gas. As it routinely does in connection with other incidents, the Company also reevaluated its practices and

procedures in response to the experience gained as a result of the Barnhart incident and implemented appropriate revisions.

4. On August 16, 2000, the Company filed its Answer and Motion to Dismiss Staff's Complaint in Case No. GC-2001-19 as well as its Response to Staff's Recommendations in Case No. GS-2000-525. In these pleadings, the Company denied that it or its employees had violated Commission Rule 4 CSR 240-40.030 (14)(C). The Company also stated its position regarding the various recommendations made by Staff and noted the steps it had already taken or believed should be taken in response to the Barnhart incident.

5. On September 13, 2000, the Commission issued its Order in which it consolidated Case Nos. GC-2001-19 and GS-2000-525 and scheduled a prehearing conference for October 18, 2000 in order to provide the Parties with an opportunity to define, discuss and possibly resolve the issues raised in these cases. As a result of their respective evaluations of the Barnhart incident, as well as their discussions both during and subsequent to the prehearing conference, the undersigned Parties have been able to agree on a proposed resolution of all of the issues in these consolidated cases, and hereby stipulate and agree as follows:

(a) The Company's procedures for responding to emergencies beyond routine leak investigations shall be revised as set forth in Attachment 1 to this Stipulation. The purpose of these revisions is to reflect those measures that have been, and the Parties believe should be, undertaken to further enhance the safe, effective and timely correction of emergency situations in which: (1) the concentration of gas in a structure cannot be determined because of the Company's inability to gain entrance to the structure, or (2) the

concentration of gas in or around a structure has been determined to fall outside safe limits and initial efforts to reduce the migration of gas sufficiently have not been successful. To that end, the revised procedures emphasize:

- (i) an increased reliance on local fire and police department personnel for purposes of assisting in the prompt termination by other utilities of ignition sources within such structures;
- (ii) the establishment, as permitted by local fire and police department personnel, of safety areas designed to keep customers, employees and the general public at a safe distance from such structures; and
- (iii) the authority of, and need for, field personnel to consider, and, as appropriate, promptly take other corrective actions, including the closing of valves, heavy equipment-assisted excavations and full venting and clamping of ruptured facilities, in the event initial response efforts are unsuccessful and such actions appear advisable given the conditions existing at the site at that time.

(b) The Company's distribution, coordination and utilization of mobile communications equipment among and between the Company's leak response and construction crews and dispatching operations shall be augmented to further enhance the prompt availability and acquisition of mechanical digging equipment in situations where such equipment may be useful in performing emergency-related excavations.

(c) The Company shall incorporate into its employee training program, and continue to emphasize during subsequent training sessions, the emergency procedure revisions and other measures aimed at preventing or reducing third-party damage to the

Company's facilities and enhancing the Company's response to situations where such damage has resulted in the escape and migration of natural gas.

(d) The Company, Staff and Public Counsel shall continue to cooperate on promoting efforts aimed at preventing third-party damage to underground gas and other utility facilities, particularly damage caused by horizontal boring and other excavation techniques that, because of their intrinsic characteristics, pose the greatest danger to public safety. Such efforts shall include, among others:

- (i) continuation of the program begun by the Company in the summer of 1999 to enhance the scope and effectiveness of its damage prevention program, including an increased emphasis on identifying chronic offenders; utilizing facility locate or other personnel, where feasible and appropriate, to identify and monitor instances where horizontal boring may be used, especially around critical facilities, and supporting Missouri One-Call efforts to reduce number of instances where excavator fails to describe planned excavation method when giving excavation notification;
- (ii) periodic distribution of the letters set forth in Attachment 2 to this Stipulation, which are designed to remind contractors subject to the requirements of the Missouri One Call statute as well as utilities subject to the Commission's rules governing buried cable installations, of their obligations to comply with such requirements when excavating around underground facilities;
- (iii) support for enforcement of existing laws and regulations designed to prevent third-party damage to underground facilities that threatens public safety;

including sponsorship of an educational seminar emphasizing such requirements to be funded by the Company; and

(iv) support for legislative initiatives aimed at preventing third-party damage.

6. The Parties understand and expressly represent that the recommendations set forth herein have been made in a good faith effort to protect the safety of the Company's customers, its employees and the general public through measures that are intended to reduce the future frequency and magnitude of third-party damage to the Company's facilities and further enhance the Company's ability to respond to future emergencies in a prompt and effective way. None of these proposed resolutions, or the approval and adoption thereof, should be construed as an indication of any prior wrongdoing, error or omission on the part of any Party or person.

7. The Parties recommend that Staff's Complaint in Case No. GC-2001-19 be dismissed upon Commission approval of this Stipulation and that both Case Nos. GC-2001-19 and GS-2000-525 be closed.

8. This Stipulation represents a negotiated settlement for the purpose of disposing of all of the issues presented in this case. None of the Parties to the Stipulation shall have been deemed to have approved or acquiesced in any legal or factual assertion or any claim relating to compliance with, or violation of, any Commission rule or other legal requirement, principle or standard, and none of the Parties shall be prejudiced or bound in any manner by the terms of this Stipulation in any other proceeding, except as otherwise expressly specified herein.

9. The Staff may submit to the Commission a memorandum explaining its rationale for entering into this Stipulation. Each Party of record shall be served with a

copy of any such memorandum and shall be entitled to submit to the Commission, within five (5) days of receipt of Staff's memorandum, a responsive memorandum which shall also be served on all Parties. All memoranda submitted by the Parties shall be considered privileged in the same manner as are settlement discussions under the Commission's rules; shall be maintained on a confidential basis by all Parties; and shall not become a part of the record of this proceeding or bind or prejudice the Party submitting such memorandum in any future proceeding or in this proceeding, whether or not the Commission approves this Stipulation. The contents of any memorandum provided by any Party are its own and are not acquiesced in or otherwise adopted by the other signatories to this Stipulation, whether or not the Commission approves and adopts this Stipulation.

10. The Staff shall have the right to provide, at any agenda meeting at which this Stipulation is noticed to be considered by the Commission, whatever oral explanation the Commission requests; provided that the Staff shall, to the extent reasonably practicable, promptly provide other Parties with advance notice of when the Staff shall respond to the Commission's request for such explanation once such explanation is requested from the Staff. Staff's oral explanation shall be subject to public disclosure, except to the extent it refers to matters that are privileged or protected from disclosure pursuant to any protective order in this case.

11. The agreements contained in this Stipulation have resulted from extensive negotiations among the Parties and are interdependent. In the event the Commission does not approve or adopt the provisions of this Stipulation in total, then this Stipulation shall be void and no signatory shall be bound by any agreements or provisions hereof.

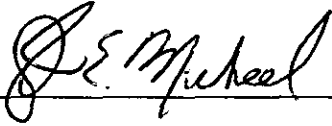
12. To assist the Commission in its review and consideration of this Stipulation, the Parties also request that the Commission advise them of any additional information that the Commission may desire from the Parties relating to the matters addressed in this Stipulation, including any procedures for furnishing such information to the Commission.

WHEREFORE, the signatories hereto respectfully request that the Commission approve this Unanimous Stipulation and Agreement as expeditiously as possible.

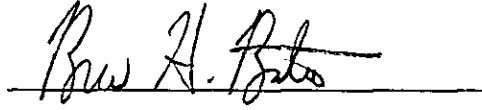
Respectfully submitted,



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CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant Vice-President, Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Unanimous Stipulation and Agreement has been duly served upon all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 2nd day of November, 2000.

ATTACHMENT 1

PROCEDURE FOR EMERGENCIES
(BEYOND ROUTINE LEAK INVESTIGATION)

Emergency situations, such as broken mains and services, blowing gas, major gas outages, etc., are generally reported to the Central Dispatcher at 720 Olive, by such sources as:

1. Fire or Police Departments
2. Customers
3. The Public
4. Other Utilities
5. Company Employees
6. Outside Contractors
7. Missouri One-Call

Emergency situations that have been reported to company personnel in the field or District Service Centers shall be reported to the Central Dispatcher as soon as possible.

Reporting an Emergency by Mobile Radio System/Cellular Phones

Company personnel reporting an emergency by mobile radio or cellular phone shall:

1. Inform the Mobile Operator (or dispatcher) that an emergency is being reported.
2. Identify themselves to the Mobile Operator (or dispatcher).
3. Confirm that the emergency is being reported to a supervisor.

It is the Central Dispatcher's responsibility to notify all parties concerned with the emergency both inside and outside the Company. The Central Dispatcher shall contact all company supervision and/or personnel that will be involved in the emergency, in compliance with the "Emergency Procedure Schedule" and shall relay all information concerning the emergency, such as:

1. Nature of Emergency
2. Address and/or location of emergency
3. Area Code
4. Fire Department or News Media on scene
5. Extent of Damage, if known or reported
6. Injuries or fatalities
7. Type of buildings involved (if any), such as schools, warehouses, residences, etc.
8. Name, address, and telephone number of company or person responsible for damage to company facilities, if known or reported.

The PRIMARY considerations of the Company personnel on the site of the emergency shall be:

1. Safety of customer and public
2. Safety of employees
3. Protection against property damage
4. Inconvenience to customer
5. Public relations

Liaison with News Media

All contacts with news media are to be made through the Corporate Communications Department.

A. Uncontrolled Gas Due to Main or Service Damage or Failure

In the event of a gas main or service break or failure, the District Leak Foreman shall be notified and shall immediately dispatch a Leak Truck to the location. The District Leak Foreman shall notify the District Leak General Foreman of the emergency (except during off-hours, *** when the duty supervisor shall be notified**), and one or both shall proceed as soon as practical to the location of the emergency.

*** During off hours the "Call Out Duty Supervisor" shall be called when needed for assistance and/or notification.**

The Company personnel on the site of the emergency shall:

1. Clear occupants from buildings or area of emergency where an immediate hazard exists.
2. Notify the Central Dispatcher of the scope of the emergency. If the District Leak Foreman or General Foreman determine that assistance will be required, the Central Dispatcher will make arrangements with the various departments that will provide assistance.
3. Turn off service at curb box or riser, if practical.

NOTE: Do not close main valves or shut down a main unless permission is obtained from System Control. This is in compliance with L.G.C. Standard #10000. (Check Standard #10000 for exceptions for small diameter mains).

4. Take action to eliminate sources of ignition, such as: Prohibit smoking, prevent operation of electrical switches, extinguish open flames, eliminate pilot lights, prevent opening of furnace doors, etc.
5. Ventilate affected buildings by opening windows or doors. (Lower windows from top if possible. If buildings are multiple story structures, open windows at highest level).

For propane gas see Section XV 402:4 in this manual. If there is a strong odor of gas and the C.G.I. indicates a reading of 1% gas or above in free air (unconfined area) in any part of the building, the condition must be considered very serious and the actions outlined in Section III, part B of this procedure manual should be taken as quickly as possible.

6. If main or service is broken and blowing, stop or reduce the flow of gas in a prompt, effective manner by appropriate methods, including the use of valves as necessary to protect life and property.
7. Check for gas outages in the immediate area. Request assistance from S.A.I.D. when needed.
8. To mitigate underground lateral migration of gas, dig vent holes and/or open manhole covers when necessary, to prevent gas from entering buildings. Special attention should be given to those circumstances where gas can more easily migrate, such as damages caused by boring, or a service pulled out of a main, etc...
9. Barricade the danger area. Authorized personnel only inside the barricaded area.
10. Reroute vehicular traffic, if necessary.

NOTE: The Claims Department shall be notified whenever a situation requires emergency action, such as evacuating a building, blocking off an area, or rerouting of traffic.

11. All buildings in the immediate area shall be checked with a Combustible Gas Indicator. (Sufficient personnel shall be provided to do this.) The check shall be made in the following sequence:
 - a. Interior -
All buildings on both sides of the street shall be entered as soon as possible and Combustible Gas Indicator checks made at the following points:
 1. Underground utility services entering the building (gas, water, oil, conduits, etc.)
 2. Drains and sewers (sanitary and storm)
 3. At the top of exterior and/or basement walls
 4. At cracks in the floor or exterior basement walls
 5. In basementless buildings, crawl spaces, or openings below the floor level.

If unable to perform interior CGI checks because a building has no entry and there is reason to believe gas may be migrating into the building (e.g., a main or

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service cut by boring, a service pulled out of a main, etc...), the following procedure shall be followed:

1. Establish a safety area where all customers, public and Laclede employees are kept out of the affected area.
2. Notify the police and fire departments* to assist in evacuations of and maintaining the security of the safety area.
3. Gas services within the safety area should be turned off at the curb valve or riser.
4. Eliminate all probable sources of ignition within the safety area. To accomplish this, electric and telephone utilities* should be called using the 911 system to cut all electric and telephone services within the safety area.

*NOTE: The Central Dispatcher shall assist in notifying the Police and Fire Departments. The Fire Department shall call the electric and telephone utilities. The Central Dispatcher shall also contact the Construction & Maintenance District Superintendent or Duty Supervisor during off-hour periods in such circumstances.

5. All corrective actions, including leak searching, monitoring for gas migration, closing of valves, excavating squeeze-off or bypass holes, should be performed outside of the safety area until all probable ignition sources are eliminated and appropriate venting has occurred.

b. Exterior -

After the interior checks have been completed, an exterior check shall be made at the following points:

1. Over the service line and around the building walls, to within at least one foot of the building wall, particularly in the old ditch lines.
2. Down spouts
3. Street openings such as boxes, sewers, drains, vaults, manholes, lamp posts, traffic signals, control boxes, etc.

The construction and maintenance department supervisor at the scene of an emergency shall be responsible for coordinating the efforts of all company personnel responding to the situation and have authority for all decisions in handling the emergency.

If the corrective actions being taken do not have the desired effect, other actions must be taken in a prompt, effective manner to make the area safe, including, but not limited to, full venting and/or clamping of ruptured facilities if such action can be performed in a safe manner outside the safety area.

B. Leak Repair on Broken Mains and Other Serious Gas Leaks

In all cases, in the vicinity of blowing gas or other serious leaks, the following procedure shall be carried out:

1. It shall be mandatory that while working on any blowing gas or other serious leak in which a shutdown has not been effected, flash suits complete with air supplied face mask and leather work gloves shall be worn.

NOTE: When a flash suit and a respirator are required in an emergency repair situation, a safety harness shall be worn in excavations 4' deep or deeper.

2. It is mandatory that the following safety precautions be followed before and during the process of working a blowing gas or other serious leak.
 - a. Position at least two (2) dry chemical fire extinguishers where they can be ready for immediate use.
 - b. Test the air supply to the air line respirator for carbon monoxide. (It shall be the wearer's responsibility to perform and record the test in compliance with the instructions that are included with the testing equipment).

NOTE: A compressor shall not be used to supply air to an air line respirator if any carbon monoxide is found in the air supply.

- c. Before entering an excavation, where gas is blowing or a serious leak exists, an escape route shall be planned in case it should become necessary to exit an excavation quickly.
 - d. Before any employee enters an excavation containing a blowing gas or other serious leak, he shall be equipped with a flash suit, air line respirator mask, and leather work gloves.

NOTE: When a flash suit and a respirator are required in an emergency repair situation, a safety harness shall be worn in excavations 4' deep or deeper.

- e. When it is necessary for two employees to work in an excavation containing blowing gas or other serious leak (at the same time), provision shall be made to have two (2) other employees present on the job site to render any assistance required to the two (2) employees working in the excavation.
 - f. The "Emergency" Leak Truck, (containing special equipment such as "HALT" equipment, squeeze off tools, etc.) shall be kept readily available if it should become necessary to call the truck to the site of an emergency.

- g. Metal vent stacks shall be used to vent blowing gas from an excavation when it is practical to do so.
- h. If the leak is on a plastic main, (* NOTE) the main shall be "drenched" with "Static Discharge Solution" that is provided on each Leak Truck. Then cloths shall be wrapped around the main and kept saturated with the solution. The cloths shall be kept in contact with the earth while repairs are being made.

NOTE: If the area is dry and dusty, it is advisable to wet the work area with water. (See Letter Regarding "Static Electricity on Polyethylene Pipe - Causes, Hazards and Solutions" in Section XVI, Page 4 of this manual).

* NOTE: When possible, perform squeeze-off operations in a separate bell hole, remote and upwind, if possible, from the leak and, if applicable, outside the safety area. See Part III, Page 10-B, Accident Prevention Manual and Laclede Standards, 10510 & 10511.

- i. All safe work practices and use of personal protective equipment rules shall be followed in compliance with the "Accident Prevention Manual" and the notice written by the "Manager of Employee Development, Occupational Health and Safety". (This notice is located in Section XVI, Page 7 of this Manual).

The construction and maintenance department supervisor at the scene of an emergency shall be responsible for coordinating the efforts of all company personnel responding to the situation and have authority for all decisions in handling the emergency.

C. Gas Service Outage

If service outage is caused by main damage, or a main must be "shut down" to make repairs, the following shall be done:

1. An investigation shall be made to determine how many services are involved and what type buildings they serve.
2. The first person to have this information shall have the Central Dispatcher relay the information to the area S.A.I.D. Foreman so that he will be able to provide sufficient manpower to cover the outage. The District Leak Foreman shall be notified and shall immediately dispatch a Leak Truck to the location.

NOTE: If the damage is of a serious nature and the service outage is major, the first person with this information shall have the Central Dispatcher notify the S.A.I.D. District Superintendent and/or the S.A.I.D. General Foreman on duty, the Construction and Maintenance District Superintendent and/or Assistant Superintendent of the Leak Division.

3. All services that are involved shall be turned off at the curb cock, outside riser, or meter.
4. All affected services in which a curb cock cannot be located or operated, and entry to the premises cannot be gained, shall be shut off by some other means.
5. All addresses of services that are turned off shall be recorded on the "Emergency Shutdown - Field Survey", form F-550.

NOTE: All main "shutdowns" shall be in compliance with L.G.C. Standard #10000. If it is necessary to purge a main after repairs are made, it shall be done in compliance with L.G.C. Standard #10500, Article XII and L.G.C. Standard #10000. If nitrogen is used for purging, it shall be done in compliance with L.G.C. Standard #14515. Do not purge a main without first contacting System Control.

After repairs have been made and the main is back in service, the following shall be done:

1. Recheck the area for additional leaks.
2. Restore service to all buildings that have been turned off. Originate a C.I.S. order for each meter turned back on.
3. Check off services that have been turned on and relit and initial each "turn-on" on form F-550, "Emergency Shutdown - Field Survey".
4. Service to buildings with "No entry" shall be left turned off.
5. Service to buildings that have been left turned off because of "no entry" shall be "tagged" at the door with form F-696.
6. Addresses of service to buildings that have been left turned off because of "no entry" and the door "tagged" shall be recorded on form F-550, "Emergency Shutdown - Field Survey".
7. Addresses of buildings where service has been left turned off because of "no entry" shall be reported to the Central Dispatcher.

NOTE: This note applies to all services turned off. During subfreezing temperatures, every effort shall be made to gain entry into buildings to restore gas service (including contacting city agencies for phone numbers, etc.). If water lines freeze and burst, expensive water damage may occur.

The responsible Supervisor shall keep a log of all significant events, such as:

1. The time the incident was dispatched to the District Leak Foreman.

2. The time the District Leak Foreman dispatched a Leak Truck.
3. The time the Leak Truck arrived on the site of the incident.
4. The time the District Leak Foreman arrived on the site of the incident.
5. All company personnel's statements of what they observed at the site of the incident.
6. The time traffic was rerouted or detoured, if necessary.
7. The time traffic was restored to normal.

NOTE: The Claims Department shall be notified when traffic is returned to normal.

8. The time gas control was established.
9. The time mains and services were restored to normal operation.
10. What corrective steps were taken to restore normal operations.
11. An accurate report of property damage or personal injury, if any, shall be reported on a "Report to Legal and Claim Departments", Form #632, or a "Report of Minor Damage", form F-632A. These reports shall be sent to the Claims Department as soon as possible. Complete other reports as instructed at the site of the incident.
12. An accurate report of any damage to company property shall be reported on a "Report of Damage to Gas Company Property", form F-647. This report shall be sent to the Claims Department as soon as possible.

The construction and maintenance department supervisor at the scene of an emergency shall be responsible for coordinating the efforts of all company personnel responding to the situation and have authority for all decisions in handling the emergency.

D. Explosion

In the event of an explosion, the Company personnel on the scene shall carry out the following:

1. Inform the fire and/or police officials on the scene of your presence, and determine if there are any injuries or fatalities.

2. Turn gas off at the meter (if possible) and at curb box or riser. (If it can be done without risking possibility of injury, observe the test hand on the meter before gas is turned off to determine if there is an open fuel run).
3. Contact the Central Dispatcher and give him all the information concerning the incident. The Central Dispatcher shall relay the information to the various parties concerned with the incident, in compliance with the "Emergency Procedure Schedule", as described on Page One (1) of this procedure.
4. Eliminate sources of ignition.
5. Ventilate building(s), if necessary.
6. Combustible Gas Indicator checks shall be made in the affected building(s) over the services and mains, inside adjacent building(s), in sewers and manholes, etc., to see that there are no gas leaks and further building involvement. If the explosion was violent in nature, expand the area of the leak check.
7. After the situation is controlled, take pressure readings.
8. Do not change or remove a meter, service regulator, or abandon a service without approval of the Claims Department.
9. An accurate report of property damage, personal injury, and "Determined Cause" shall be reported on a "Report to Legal and Claims Departments", form F-632, and sent to the Claims Department as soon as possible.
10. An accurate report of any damage to company property shall be reported on a "Report of Damage to Company Property", form F-647, and sent to the Claims Department as soon as possible.
11. The senior Service and Installation Supervisor on the scene shall be responsible for coordinating the efforts of all Company personnel responding to the situation, and have authority for all decisions in handling the emergency.
12. Incident Checklist shall be reviewed and discussed, with a de-briefing following shortly thereafter.

E. Fire

In the event of a fire, the Company personnel on the scene shall carry out the following:

1. Inform the Fire Chief on the scene of your presence and determine if there are any injuries or fatalities.

2. Turn off gas at meter (if possible) and at curb box or riser. If it can be done without risking possibility of injury, observe the test hand on the meter before gas is turned off to determine if there is an open fuel run. If gas is to be left off, attach a "Fire Tag" form F-853 at lock cock, if possible.
3. Contact the Central Dispatcher and give him all the information concerning the incident. The Central Dispatcher shall relay the information to the various parties concerned with the incident in compliance with the "Emergency Procedure Schedule", as described on Page One (1) of this procedure.
4. On fires of three (3) alarms or greater, obtain curb box locations of all adjacent buildings in case fire should spread.
5. When the fire has been contained, Combustible Gas Indicator checks shall be made inside (if possible) and outside building.
6. Take pressures if possible.
7. Do not change or remove a meter or service regulator without approval from the Claims Department.
8. If the Fire Chief gives approval to turn gas back on, leak test fuel runs and check all appliances. Disconnect and "cap off" any hazardous appliance and issue a "Hazardous Appliance Report", form F-627.
9. An accurate report of property damage, personal injury, and "Determined Cause" shall be reported on a "Report to Legal and Claims Departments", form F-632, and sent to the Claim Department as soon as possible.
10. An accurate report of any damage to company property shall be reported on a "Report of Damage to Company Property", form F-647, and sent to the Claims Department as soon as possible.

NOTE: If the Fire Department has left the scene of the fire before any Company personnel has arrived, contact shall be made with the Fire Chief at his station to obtain information concerning the fire, for the "Report to Legal and Claims Departments", form F-632.

11. The senior Service and Installation Supervisor on the scene shall be responsible for coordinating the efforts of all Company personnel responding to the situation, and have authority for all decisions in handling the emergency.
12. An Incident Checklist will be required and reviewed as soon as possible.

F. Serious Injury or Death Due to Asphyxiation

In the event of serious injury or death due to asphyxiation, the Company personnel on the scene shall carry out the following:

1. Inform Fire and/or Police Officials on the scene of your presence. Secure information as to the cause of the injuries or fatalities.
2. Turn off gas to the portion or to all of a building where an emergency exists.
3. Contact the Central Dispatcher and give him all the information concerning the incident. The Central Dispatcher shall relay the information to the various parties concerned with the incident, in compliance with the "Emergency Procedure Schedule", as described on Page One (1) of this procedure.
4. Disconnect and "cap off" any known hazardous appliances and issue a "Hazardous Appliance Report", Form #627.
5. Make Combustible Gas Indicator checks both inside and outside of building(s).
6. Make a leak check on customer's fuel run by appropriate methods and record both lock up and working gas pressures.
7. An accurate report of property damage, personal injury, fatalities, and "Determined Cause" shall be reported on a "Report to Legal and Claims Departments", form F-632, and sent to the Claims Department as soon as possible.
8. The senior Service and Installation Supervisor on the scene shall be responsible for coordinating the efforts of all Company personnel responding to the situation, and have authority for all decisions in handling the emergency.
9. An Incident Checklist will be required and reviewed as soon as possible.

G. Building Collapse As the Result of Earthquake, Tornado, Severe Storm, or Unforeseen Circumstances

In the event of a tornado or severe storm or earthquake, etc., the Company personnel on the scene shall carry out the following:

1. Inform the Fire and/or Police Officials on the scene of your presence. Determine if there have been any injuries or fatalities and the extent of damages.
2. Turn gas off at curb (if possible) to any collapsed structures. Addresses of service that have been turned off shall be recorded on the "Emergency Shutdown - Field Survey", form F-550.
3. Contact the Central Dispatcher and give him all the information concerning the incident. The Central Dispatcher shall relay the information to the various parties

concerned with the incident in compliance with the "Emergency Procedure Schedule" as described on Page One (1) of this procedure.

4. Make a Combustible Gas Indicator check over mains and services (where possible) in the general area of any collapsed buildings.
5. Make a Combustible Gas Indicator check in buildings adjacent to any collapsed building. Also leak check customer's fuel run (if possible).
6. An accurate report of property damage, personal injury, and "Determined Cause" shall be reported on a "Report to Legal and Claims Departments", form F-632, and sent to the Claims Department as soon as possible.
7. An accurate report of any damage to company property shall be reported on a "Report of Damage to Company Property", form f-647, and sent to the Claims Department as soon as possible.
8. The senior Service and Installation Supervisor on the scene shall be responsible for coordinating the efforts of all Company personnel responding to the situation, and have authority for all decisions in handling the emergency.
9. An Incident Checklist will be required and reviewed as soon as possible.

H. Flash

When a flash occurs at a customer's appliance, the S.A.I.D. personnel dispatched to the scene shall carry out the following:

1. Obtain statement from the customer to determine what had happened, and if the customer was using the appliance in a safe and proper manner.
2. Check the appliance, including the lock up and working gas pressures. If the safeties are operating properly and there are no hazards, the appliance may be put back in operation.
3. If the appliance is in a hazardous condition, it shall be disconnected and "capped off", and a "Hazardous Appliance Report", form F-627 shall be issued.
4. An accurate report of property damage, personal injuries or fatalities shall be reported on a "Report to Legal and Claims Departments", form F-632, and sent to the Claims Department as soon as possible.

PROCEDURE FOR LEAK INVESTIGATION
AND
STREET LEAK CLASSIFICATION

A. GENERAL - (Street Leaks)

All reports of gas leaks or odor calls from the general public, police, fire or other authorities, or notification of damage to facilities by contractors or other outside sources shall require immediate investigation and classification. Particular attention shall be given to leaks in sealed and unvented areas, and the proximity of schools, churches, hospitals, buildings of public assembly, transmission lines, and copper services.

B. INSPECTION

Form #712, "Report of Street Leak" will be prepared for all reported odors and damage to company facilities. Procedure for inspection of street leaks with combustible gas indicator on Customer's premises: Inside, Outside, Curb, Street Area, width of Customer's premises, until odor or leak limits are defined.

1. Inspection Inside Customer's Premises:

- a. Inside foundation walls
- b. Cracks in foundation
- c. Service entry
- d. Meter
- e. Along top of foundation at floor joist
- f. Sanitary sewer outlet in basement. (In case of basementless house, sanitary sewer outlet in utility room).
- g. Water service, ducts, and any accessible opening through which gas may enter.

2. Inspection Outside on Customer's Premises:

- a. Outside wall or as close to wall as possible
- b. Down spouts
- c. Sanitary sewer vent or any manholes in yard
- d. Check known water and sewer ditches

- e. Where yard light and grill are connected to outside meter and a reading is obtained at this location, shut off same at meter cock, ventilate and take second reading.
 - f. Five feet (5') to fifteen feet (15') from building thoroughly. Then approximately every fifteen feet (15') over service to curb.
3. Curb, Along Curb, and Street Area:
- a. Curb box or immediate vicinity
 - b. Curb box in concrete unable to probe, take first reading, ventilate, take second reading.
4. Along Curb:
- a. Overhead light post
 - b. Fire hydrants
 - c. Fire and Police alarm boxes
 - d. Traffic signal lights
 - e. Crack in pavement
5. Sub-structures, manholes, vaults, pits,(boxes, such as water valve)
- a. Company manholes and vaults
 - b. Sanitary sewer
 - c. Storm sewers
 - d. Water (meter and valve)
 - e. Union Electric
 - f. Bell Telephone
 - g. Tunnels
 - h. Western Union
 - i. Steam and refrigerant
 - j. City Light
 - k. Fire and Police

Company safety rules must be exercised at all times on Customer's premises. Hard hats must be worn to protect the head from bumps and scrapes on rafters, low ducts, I-beams, low pipes, tree branches, etc. A flashlight must be used when entering dark buildings and basements. Observe stairwells before entering for clutter and loose boards. Observe footing in yards for holes, ice, low shrubs, etc., Part VIII, working on customer premises, sub-part 8.1, Page 40, Accident Prevention Manual. Insist that customer confine any animals. Part VIII, Working on Customer's Premises, Sub-Part 8.2, Animal Bites, Page 40, Accident Prevention Manual.

Extreme care to protect the Customer and his property shall be exercised at all times. If combustible readings are detected in a building, extreme care to protect the customer and his property shall be exercised at all times. If there is a strong odor of gas and the C.G.I. indicates a reading of 1% gas or above in **free air (unconfined area)** in any part of the building, the condition must be considered very serious and the following action shall be taken as quickly as possible:

1. Inform customer not to turn on/off electrical switches or appliances.
 2. Clear the building of all occupants.
 3. Ventilate structure - open windows on the highest floor, preferably from the top, when possible.
 4. In cases where gas is emanating from Company facilities, turn off supply at meter or curb cock.
 5. Eliminate all probable sources of ignition such as smoking, striking matches, operating electric switches, etc.
 6. Notify dispatcher or leak division supervisor on duty or correct situation.
 7. Monitor conditions in area until the situation has been corrected.
 8. Stay out of building and keep others away at a safe distance.
 9. If the inside gas readings is not decreasing and is at 1% or above in **free air (unconfined area)**, notify the Fire Department.*
 10. If the inside gas readings are not decreasing and are at 4% or above in **free air (unconfined area)**, establish a safety area and eliminate all additional probable sources of ignition within such area. To accomplish this electric and telephone utilities* should be called using the 911 system to cut all electric and telephone services within the safety area.
- *NOTE: The Central Dispatcher shall assist in notifying the Police and Fire Departments. The Fire Department shall call the electric and telephone utilities, when applicable. The Central Dispatcher shall also contact the Construction & Maintenance District Superintendent or Duty Supervisor during off-hour periods in such circumstances.
11. CGI monitoring shall continue until area is considered safe.

C. STREET LEAK INVESTIGATION AND CLASSIFICATION PROCEDURES -

Per: Missouri Public Service Commission Pipeline Safety Regulations, Federal Section 191.605, Missouri Section (14)(B).

1. Each operator - detected leak indication or any leak or odor call from the general public, police, fire or other authorities or notification of damage to facilities by

contractors or other outside sources shall require immediate investigation and classification.

2. Investigation of each inside leak or odor notice shall include the use of gas detection equipment.
3. Investigation of underground leaks shall be conducted using gas detection equipment. Sampling of the subsurface atmosphere shall be done at sufficient intervals and locations to assure safety to persons and property in the immediate and adjacent area.
4. Except for obvious Class 1 leaks, all leak classifications shall be substantiated by the use of gas detection equipment.

5. Class 1 and 2 Leak Repairs.

A follow-up leak investigation shall be conducted immediately after the repair of each Class 1 or Class 2 leak, and continued as necessary, to determine the effectiveness of the repair and to ensure all hazardous leaks in the affected area are corrected. This investigation shall include CGI checks at all points necessary to ensure the entire area is clear. Special attention shall be placed on follow-up CGI checks at the following locations when applicable:

1. Inside buildings
2. Outside foundation walls
3. Sanitary sewers
4. Vaults
5. Bell manholes
6. Storm sewers
7. Curb boxes, gas and water
8. Lamp posts
9. Any other opening which may act as a conduit
10. Other open excavations.

Additional leak indications found during this follow-up which are remote and independent of the repaired leak shall require a separate leak investigation and the initiation of an additional Report of Street Leak (F-712).

Class 3 Leak Repairs

Class 3 leak repairs shall require follow-up CGI checks at points which determined the leak classification and in both directions over the gas line to ensure the leak has been repaired. These locations must be clear before the leak is cleared within the leak control system. Additional leak indications found during this follow-up which are remote and independent of the repaired leak shall require a separate leak investigation and the initiation of an additional Report of Street Leak (F-712).

D. LEAK CLASSIFICATIONS

1. Class 1 leak is a gas leak which, due to its location and/or magnitude, constitutes an immediate hazard to a building and/or the general public. It shall require immediate corrective action which shall provide for public safety and protect

property. Examples of Class 1 leaks are: a gas fire, flash or explosion; broken gas facilities such as contractor damage, main failures or blowing gas in a populated area; an indication of gas present in a building emanating from operator-owned facilities; a gas reading equal to or above the lower explosive limit in a tunnel, sanitary sewer or confined area; gas entering a building or in imminent danger of doing so; and any leak which, in the judgement of the supervisor at the scene, is regarded as immediately hazardous to the public and/or property. When venting at or near the leak is the immediate corrective action taken for Class 1 leaks where gas is detected entering a building, the leak may be reclassified to a Class 2 leak if the gas is no longer entering the building, nor is in imminent danger of doing so. However, the leak shall be rechecked daily and repaired within fifteen (15) days. Leaks of this nature, if not repaired within five (5) days may need to be reported as a safety-related condition, as required in 4 CSR 240-40.020(12) and (13). [191.23 and 191.25]

2. Class 2 leak is a leak that does not constitute an immediate hazard to a building or to the general public, but is of a nature requiring action as soon as possible. The leak of this classification must be rechecked every fifteen (15) days until repaired, to determine that no immediate hazard exists. A Class 2 leak may be properly reclassified to a lower leak classification within fifteen (15) days after the initial investigation. Class 2 leaks due to readings in sanitary sewers, tunnels, or confined areas must be repaired or properly reclassified within fifteen (15) days after the initial investigation. All other Class 2 leaks must be eliminated within forty-five (45) days after the initial investigation, unless it is definitely included and scheduled in a rehabilitation or replacement program to be completed within a period of one (1) year, in which case the leak must be rechecked every fifteen (15) days to determine that no immediate hazard exists. Examples of Class 2 leaks are: a leak from a transmission line discernible twenty-five feet (25') or more from the line and within one hundred feet (100') of a building; any reading outside a building at the foundation or within five feet (5') of the foundation; any reading greater than fifty percent (50%) gas-in-air located five to fifteen feet (5' - 15') from a building; any reading below the lower explosive limit in a tunnel, sanitary sewer or confined area; any reading equal to or above the lower explosive limit in a vault, catch basin or manhole other than a sanitary sewer; or any leak, other than a Class 1 leak, which in the judgement of the supervisor at the scene, is regarded as requiring Class 2 leak priority.
3. Class 3 leak is a leak that does not constitute a hazard to property or the general public but is of a nature requiring routine actions. These leaks must be repaired within five (5) years and be rechecked twice per calendar year, not to exceed six and one-half (6½) months, until repaired or the facility is replaced. Examples of Class 3 leaks are: any reading of fifty percent (50%) or less gas-in-air located between five and fifteen feet (5' - 15') from a building; any reading located between fifteen and fifty feet (15' - 50') from a building, except those defined in Class 4; a reading less than the lower explosive limit in a vault, catch basin, or manhole other than a sanitary sewer; or any leak, other than a Class 1 or Class 2, which, in the judgment of a supervisor at the scene, is regarded as requiring Class 3 priority.

4. Class 4 leak is a confined or localized leak which is completely non-hazardous. No further action is required.

E. DEFINITIONS:

1. The reading recorded will be the highest sustained reading when testing in the bar hole or opening without induced ventilation.
2. A sustained reading shall be construed to be the reading taken on a Combustible Gas Indicator unit after adequately venting the test hole or opening.
3. Building - any structure which is regularly or periodically occupied by people.
4. Manhole or Vault - a sub-surface structure that a man can enter.
5. Tunnel - a sub-surface passageway of a size large enough for a man to enter.
6. Follow-up Inspection - an inspection performed after a repair procedure has been completed in order to determine the effectiveness of the repair and to insure that all hazardous leaks in the area are corrected. A repeat investigation of a reported odor, where no explanation of the odor was found at first investigation.
7. Sealed or Unvented Area - an area where an underground gas leak could not readily vent itself through the soil to the atmosphere. Sealed or unvented areas include, but are not limited to, areas having pavement, sidewalks, or frozen soil.
8. Transmission Line Laclede System - is defined as a Supply Feeder or Transmission Feeder main 12" or larger in diameter.

ATTACHMENT 2

**LACLEDE GAS COMPANY
3950 FOREST PARK AVENUE
ST. LOUIS, MISSOURI 63108**

October 25, 2000

To: Excavating Contractors

AN IMPORTANT MESSAGE

Missouri Law requires every person to call for the location of underground facilities before beginning any excavation activities except in an emergency as defined by Section 319.050 of the Missouri Revised Statutes. Excavation activities by definition include digging, scraping, grading, trenching, blasting, boring, tunneling, plowing-in, ripping, backfilling, demolition of structures by either explosive or mechanical means and other earth moving operations. Laclede Gas Company ("Laclede") considers moving or removing any earth, rock subgrade, or other material below the depth of pavement during its removal to be an excavation practice. (See Section 319.015(2).

Laclede is a member of the Missouri One Call locate request system. In order to obtain information about the location of Laclede's underground facilities in an area of planned excavation activity, you must call 1-800-DIG-RITE, (1-800-344-7483). Upon obtaining the necessary excavation information from you, Missouri One Call will notify member utilities, including Laclede, of your intention to excavate. Laclede or its agent will then convey appropriate location information to you and mark the excavation site if necessary.

Laclede anticipates that, as required by Missouri law, specifically Sections 319.015-319.050 of the Missouri Revised Statutes, you will use careful and prudent excavation practices when excavating. To the extent you are working on behalf of a telecommunications or electric company subject to the safety jurisdiction of the Missouri Public Service Commission, Laclede anticipates that you will also comply with Commission Rules 4 CSR 240-32.060(15)(C) and (E), 4 CSR 240-18.010, and the National Electric Safety Code as they apply to trenching, plowing and installation of buried cable around other underground facilities.

You should expose by hand-digging any underground facility near the excavation path to verify facility location and depth prior to the use of any power operated excavating equipment. Particular care should be used to verify exact underground facility location and depth prior to the use of boring equipment and to monitor the location and depth of the boring device in relation to the facility once boring operations are commenced. Laclede expects you to protect and preserve our facilities, including gas mains, services, trace wires, valve and curb boxes, marker posts and other components of our distribution system regardless of depth or location. Laclede also expects that you will abide by the law and immediately notify Laclede when any of these facilities are damaged, dislocated or disturbed. If damage of any type occurs to Laclede facilities, keep everyone at a safe distance from the work site and notify Laclede immediately at 314-342-0800 (collect if necessary). Do not attempt to control the flow of gas or attempt to repair the gas facilities. Besides being dangerous, it is against the law to make unauthorized repairs to gas lines. After notifying Laclede, also notify Missouri One Call immediately at 1-800-344-7483 to report the damage.

It is imperative that all damages, dislocations or disturbances to Laclede facilities be reported to avoid future potential public safety and property hazards. As an encouragement to notify Laclede immediately, repair charges will not be pursued in many cases where no gas leak has occurred, such as minor scratches

or disturbances to plastic, cast iron or steel mains and coatings. Laclede will pursue monetary damages to recover the costs of restoring or replacing any of our facilities that we determine to be damaged or disturbed by careless or imprudent excavation practices.

It is Laclede's practice to indicate the presence of its underground facilities in the requested area of excavation with yellow paint and or flags, and to document our response to each locate requested. If no facilities are present in the requested area, a positive response indicating no facilities in the area will be given to you. Laclede's response to locate requests will be expedited if you clearly and specifically define the area of excavation when calling Missouri One Call or if you indicate the locations of any proposed excavation by marking the excavation areas with white paint. If necessary, a meeting can be held with Laclede's locator on site to explain where excavations are planned.

Laclede considers the preservation of paint marks or flags to be the responsibility of the requesting party once placed, and will respond to any request to update or restore previously placed markings. To enable Laclede to accurately update previous markings, requests for updates must specifically identify the areas needing to be remarked.

If Laclede's facilities are found to be in conflict with your excavation or if additional information on depth of facilities is needed, please contact our Drafting Department at 314-658-5421. While Laclede follows minimum depth standards for our facilities during installation, it is not responsible for grade changes which may occur after installation. Therefore, the exact depth of its facilities is frequently not known and should be verified by the excavator in all cases.

You are reminded that Laclede has two (2) working days in which to respond to a request for location, therefore, requests must be made sufficiently in advance of excavation to allow for the two (2) day lead time plus applicable weekends and holidays. If you arrive at a work-site which you have requested (more than two (2) working days previous) to be located and there are no yellow locate marks and you have not received an "all clear" call from Laclede, the law requires the requesting party to make a "no response" locate request. Upon making your request, Laclede will respond within the next working day.

Enclosed are decals for your convenient use. To request additional decals or if additional information is required, please contact one of the following Laclede personnel:

Mark Lauber	314-658-5413
Jim Rieske	314-658-5446
Joe Gallagher	314-342-0540

Sincerely,

Mark D. Lauber
Superintendent of Maintenance Engineering

Enclosures

Date:

To: Regulated Electric Corporations, Telecommunications Companies and Rural Electric Cooperatives

The purpose of this letter is to remind you of your obligations under Missouri law to ensure that certain excavation activities undertaken on your company's behalf are conducted in a safe manner that avoids damage to other underground facilities. As you know, the Missouri one-call statute imposes a general requirement that all excavation activities around underground facilities be conducted in a careful and prudent manner. Section 319.035 RSMo. Such excavation activities include digging, scraping, grading, trenching, blasting, boring, tunneling, plowing-in, ripping, backfilling, demolition of structures by either explosive or mechanical means and other earth moving operation. Section 319.015(2).

In addition to this more general requirement, the Missouri Public Service Commission has also adopted specific rules to govern the underground excavation and boring activities of telecommunications companies, electric corporations and rural electric cooperatives subject to the Commission's safety jurisdiction. For example:

- Subsection (15)(C) of Commission Rule 4 CSR 240-32.060 (which governs the Engineering and Maintenance Practices of Telecommunications Companies) requires that the "trenching and plowing of cable ... be performed in such a way as to prevent unnecessary damage to private and public property". (See Attachment 1).
- Similarly, subsection (15)(E) of that same rule specifies that "telecommunications companies shall fully comply" with the requirements of the Missouri one call statute "when performing any work that endangers other companies' buried utility facilities." (See Attachment 2).
- Rule 4 CSR 240-18.010 relating to Safety Standards for Electric and Telephone Utilities and Rural Electric Cooperatives also requires that all telecommunications companies, electric companies and electric cooperatives adhere to the safety standards set forth in the National Electric Safety Code (NESC). (See Attachment 3). As noted in Subsection (1) of the Rule, Part 3 of the NESC "contains safety rules for underground electric and communications lines", that, among other things, dictate in substantial detail the specific practices that must be followed by these companies when they are installing buried cable or doing other work that may damage facilities owned by others. These include the requirement that the "[l]ocation of structures in the path of the projected cable route shall, as far as practical, be determined prior to trenching, plowing or boring operations", as well as requirements governing how such cable facilities must be installed when they cross above

or below other underground structures such as gas lines. (See Attachment 4; Sections 351A.4 and 352.B).

- Subsection (8)(B) of Commission rule 4 CSR 240-30.020 relating to Residential Telephone Underground System also provides that “[a]ll construction, installation, maintenance and operation of underground telephone systems shall be in accordance with applicable codes, orders, rules or utility specifications if the specifications comply with this rule”. (See Attachment 5).

The Missouri Public Service Commission has made it very clear that your company should be familiar with these safety rules and standards and follow them. As the Commission stated in adopting Rule 4 CSR 240-18.010: “[a]doption of this rule will not only inform the regulated utilities, to which it applies, of the minimum safety standards required by the commission but will also be of assistance to the commission staff in carrying out its assigned duties.”

Consistent with this statement, please be advised that you have an ongoing obligation to implement those training procedures, inspection and monitoring programs, and other oversight measures that may be reasonably necessary to ensure that these safety rules and standards are observed whenever your company, or another entity working on behalf of your company, engages in such activities. You should also be aware that like any other set of rules adopted by the Commission, the Staff will consider and take whatever appropriate enforcement action is necessary to ensure compliance with these requirements.

I appreciate your assistance in distributing this letter to the appropriate personnel. If you have any questions, please do not hesitate to contact me at _____.

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION
JEFFERSON CITY
September 13, 2000**

CASE NO: GS-2000-525, GC-2001-19

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

Michael C. Pendergast
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Enclosed find certified copy of an ORDER in the above-numbered case(s).

Sincerely,

**Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge**