

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

In the Matter of an Investigation into City	)	
Utilities of Springfield Plastic Pipe	)	
Failures and the Adequacy of its Leak	)	Case No. GS-2004-0257
Survey Procedures, Installation	)	
Procedures and Replacement Criteria	)	

**STAFF'S RESPONSE TO COMMISSION ORDER**

**DIRECTING FILING OF STATUS REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) by and through counsel, and for its Response to the Commission's City Utilities of Springfield's Response states:

1. Since a June 2003 natural-gas explosion which resulted from a leak of natural gas into a building at the Empire District Fair Grounds, the Commission's Gas Safety Staff and City Utilities of Springfield have been working together on a program of monitoring, evaluating, and replacing the plastic pipe in City Utilities' system.

2. The leak in the plastic pipe was the result of a rock impingement that damaged the pipe causing it to release gas, which entered the lower level of the building. The entire history of the program is covered in the attached document.

3. On October 23, 2007 Staff and the City made a Joint Recommendation to the Commission concerning how the program would proceed.

4. On November 1, 2007, the Commission issued an Order Adopting Joint Recommendation directing the parties to implement the terms of the Joint Recommendation, and that Staff file its next status report no later than April 30, 2009.

5. Attached is the Status Report which details the history of the case, City Utilities' pipe monitoring and replacement progress.

**WHEREFORE**, Staff requests the Commission accept Staff's Status Report in compliance with the Commission's November 1, 2007 Order.

Respectfully submitted,

**/s/ Lera L. Shemwell**

---

Lera L. Shemwell  
Deputy General Counsel  
Missouri Bar No. 43792

Attorney for the Staff of the  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
(573) 751-3966 (Telephone)  
(573) 751-9285 (Fax)  
lera.shemwell@psc.mo.gov

### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 30<sup>th</sup> day of April 2009.

**/s/ Lera L. Shemwell**

---