

**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) **File No. GW-2021-0272**
Commission's Natural Gas Safety Rules)

RESPONSE TO ORDER DIRECTING ADDITIONAL RESPONSES

Summit Natural Gas of Missouri, Inc. ("Summit" or "SNGMO"), pursuant to the March 22, 2021 Order in the above-captioned proceeding, submits its responses to Attachment A, Questions Related to Revisions of (12)(S)1.B. as well as Attachment B, Questions for Gas Operators – Public Leak Data.

Summit appreciates the opportunity to submit these responses and looks forward to providing further comment on proposed revisions as part of this proceeding.

Dated this 6th day of May 2021.

Respectfully submitted,

By:

/s/ Matthew Kaply

Matthew Kaply

Senior Director of Regulatory Affairs & Rates

Summit Natural Gas of Missouri, Inc.

116 Chiefs Court

Branson, MO 65616-4089

207-621-8000 x1430

Responding Operator: **Summit Natural Gas of Missouri, Inc.**

Name of Person Responding: **Darrin Chism, Director of Operations, Missouri**

Contact information: dchism@summitutilities.com; P: (720)981-2123 ext. 1658

A: GENERAL

During the pandemic, it was brought to Staff's attention that in some circumstances, customers were reluctant to allow operators access to homes to perform visual inspection of accessible customer gas piping and connected equipment required by 20 CSR 4240-40.030(12)(S)1. B. The Commission granted a temporary waiver from this requirement, subject to certain conditions.

1. Did your Company make use of this waiver at any time during the pandemic?

RESPONSE: SNGMO did not use this waiver during the pandemic.

If yes:

- a. Approximately how many times have you used the waiver?

RESPONSE Not Applicable

- b. Explain any negative consequences that you are aware of as a result of making use of waiver.

RESPONSE: Not Applicable

2. Do you foresee any future need to see relief from the requirements of 20 CSR 4240-40.030(12)(S)1. B. going forward? If yes, explain.

RESPONSE: Given the future unknowns related to the pandemic, SNGMO is unsure if it will need to seek relief from the requirements and will continue to monitor conditions and risks.

3. Do you have any additional comments related to the requirements of 20 CSR 4240-40.030(12)(S)1. B?

RESPONSE: None

SECTION B: SPECIFIC

A possible amendment to the requirement of 20 CSR 4240.40.030(12)(S)1.B would be to extend the existing exemption for large commercial or industrial customers denying access to residential and small commercial customers as drafted below:

(S) Providing Service to Customers.

1. *At the time, an operator physically turns on the flow of gas to a customer (see requirements in subsections (10)(J) for new fuel line installations) -*
 - a. *Each segment of fuel line must be tested for leakage to at least the delivery pressure; and*
 - b. *A visual inspection of the exposed, accessible customer gas piping, interior and exterior, and all connected equipment shall be conducted to determine that the requirements of any applicable industry codes, standards, or procedures adopted by the operator to assure safe service are met. This visual inspection need not be met for emergency outages or curtailments. In the event a RESIDENTIAL OR SMALL COMMERCIALS customer denies an operator access to the customer's premises, the operator does not need to comply with the above requirement, providing the operator obtains a signed statement from the customer stating that the customer will be responsible for inspecting its exposed, accessible gas piping, and all connected equipment, to determine that the piping and equipment meets any applicable codes, standards, or procedures adopted by the operator to assure safe service. In the event the customer denies an operator access to its premises and refuses to sign a statement as described above, the operator may file with the commission an application for waiver of compliance with this*

provision.

1. Would you support or opposed an amendment to 20 CSR 4240.40.030(12)(S)1.B extending to residential/small customers? Please explain why you would be in favor or opposed.

RESPONSE: SNGMO supports the proposed amendments as it provides consistency with residential/small commercial customers and large commercial/industrial customers.

2. Would you suggest any additional conditions be added to provide an exemption for residential or small commercial customers? If yes, explain.

RESPONSE: While allowing residential and small commercial customers the ability to deny inspection, SNGMO suggests that the Commission consider additional language holding harmless the company. The reason for this is that the current proposed language, “the customer will be responsible for inspecting its exposed, accessibly gas piping, and all connected equipment, to determine that the piping and equipment meets any applicable codes, standards, or procedures adopted by the operator to assure safe service,” makes the assumption that a customer would not only have the knowledge to inspect but also be up to date in current codes and standards of the company.

In addition, to reduce administrative burden, SNGMO would suggest the Commission consider alternative requirements to account for customers who deny access to the premise but refuse to provide a signature. Many customers who deny access are likely to refuse to provide a signature and SNGMO believes the administrative burden of seeking waivers will be significant.

3. Provide information on the fiscal impact an amendment to 20 CSR 4240.40.030(12)(S)1.B would have on the operations of the Company.

RESPONSE: While it is difficult to calculate an exact amount, SNGMO believes that customers denying access and signatures would be significant and the current proposed language of seeking waivers of compliance for each would create an additional workload between multiple departments ultimately leading to additional costs for the additional resources.

ATTACHMENT B – Questions for Gas Operators – Public Leak Data

Responding Operator: **Summit Natural Gas of Missouri, Inc.**

Name of Person Responding: **Darrin Chism, Director of Operations, Missouri**

Contact information: dchism@summitutilities.com; P: (720)981-2123 ext. 1658

1. Do you currently make information on active leak indications available to the public?

RESPONSE: As a required component of the annual PHMSA F-7100 Reporting, annual total active leak numbers are provided. The annual leak information and location of leaks are not available to the public, predominantly as a measure of system security among other concerns.

If yes,

- a. Provide description of what information is made public and provide recent example.

RESPONSE: As noted above, SNGMO provides leak information as part of the annual PHMSA F-7100 report which includes the number of leaks, cause, leaks on federal land and any leaks scheduled for repair at the end of the year.

- b. Explain how the information is provided (e.g., website, mailings, on request).

RESPONSE: SNGMO provides information as a component of the annual PHMSA F-7100 report which is submitted through the PHMSA online portal.

c. Explain how frequently the information is updated.

RESPONSE: SNGMO provides this information as part of the annual PHMSA F-7100 report.

2. Do you currently make information on repaired leaks publicly available?

RESPONSE: No

If yes,

a. Provide a description of what information is made public and provide recent example.

RESPONSE: Not Applicable

b. Explain how the information is provided (e.g., website, mailings, on request).

RESPONSE: Not Applicable

c. Explain how frequently the information is updated.

RESPONSE: Not Applicable

d. Explain how long the information is retained following the repair date of the leak.

REPSONSE: Not Applicable

3. If a member of the public contacts you and requests information on active or repaired leaks near a specific location, what information, if any, do you currently provide?

RESPONSE: At that time, SNGMO would share a verbal status update based on response efforts along with applicable onsite safety related guidance directly related to the specific event.

4. What are your current capabilities to make active leak indications publicly available?

REPONSE: SNGMO tracks and maintains a database of all active leaks. However, SNGMO does not have a system in place to provide or update this information to the public.

a. Explain your current process for tracking active leak indications.

RESPONSE: Historically, SNGMO tracked leaks using a leak log but recently transitioned to Patrol Master which is an electronic leak report form that can be filled out if a leak is discovered during a leak survey or during a patrol.

b. Explain to what extent active leak indications data is input into an electronic database.

RESPONSE: With SNGMO's transition to Patrol Master, all leak information is stored in an electronic database.

c. Explain to what extent active leak indications are digitized into mapping or other systems that visually indicate geographic locations.

RESPONSE: SNGMO has only recently transitioned Patrol Master and there is no direct link between this database and our GIS system.

5. What are your current capabilities to make information on repaired leaks publicly available?

RESPONSE: SNGMO's current capabilities to make repaired leak information publicly available is limited. SNGMO would need to review each repaired leak, search for associated work orders, and confirm the completion of the repair. Restructuring of this practice would require significant investments into program development.

a. Explain current process of tracking repaired leaks.

RESPONSE: SNGMO uses its work and service order system to track repaired leaks.

- b. Explain to what extent leak repair data is input into an electronic database.

RESPONSE: The work and service order system that SNGMO uses is an electronic database.

- c. Explain to what extent leak repairs are digitized into mapping, or other systems that visually indicate geographic locations.

RESPONSE: Currently, SNGMO does not digitize leak repairs into our GIS system.

6. Describe any benefits you see to making active or repaired leak information publicly available.

RESPONSE: SNGMO does not believe that there is any benefit to publicly sharing active and repaired leak information as it could impact the safety of our customers and communities.

7. Describe any concerns you have regarding making active or repaired leak information publicly available. **RESPONSE: SNGMO has security and several other similar and related concerns regarding public access of leak information. SNGMO's highest value is safety and access to this information could present a risk that could limit reporting of a leaks assuming SNGMO may already be aware, have unreported changes to leaks, or encourage malicious tampering of facilities. SNGMO promotes a "smell something, say something" culture always ensuring the safety of our customers and would not want to minimize a customer's desire to contact us.**

8. If the Commission were to require that active or repaired leak information be made publicly available, how often would you be able to update that information for the system you operate?

RESPONSE: As described in the response above, SNGMO has concerns regarding the publicly available leak information and believes it is the best interest of the customers safety that the company continue to track, maintain, and repair leaks while continuing annual reporting required by the PHMSA F-7100 reporting.