

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

In the Matter of the Application of)
Roeslein Alternate Energy, LLC for a) File No. GE-2023-0355
Permanent Waiver From Certain Provisions)
of 20 CSR 4240-40.030 (Locust Ridge Line))

RESPONSE OF RAES TO STAFF RECOMMENDATION

COMES NOW Roeslein Alternative Energy Services, LLC (“RAES” or “Company”), by and through the undersigned counsel, and for its response to the *Staff Recommendation* respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. On April 12, 2023, RAES filed an application with the Commission -- *Application for Waivers* (“Application”), requesting waivers from certain gas pressurization and odorization requirements under 20 CSR 4240-40.030 for its operation of a gas transmission line in Sullivan and Mercer Counties. RAES also requested a waiver from the Commission’s 60-day notice rule.

2. On May 25, 2023, Staff filed its *Staff Recommendation and Memorandum* in this case. Staff recommends the Commission approve RAES’ waiver request subject to fourteen conditions that are substantially identical to those found in RAES’ Application, to wit:

1. RAES may not serve any Missouri customers from this pipeline without prior Commission approval;
2. To the extent that placement of pipeline markers does not interfere with soil or crop cultivation, RAES shall install additional pipeline markers to provide markers at a minimum of line-of-sight distance along the length of the pipeline;

3. RAES shall perform a minimum 8 hour pressure test in accordance with 20 CSR 4240-40.030(12)(M)1.B.(I) and 20 CSR 4240-40.030(10)(G) for the intrastate transmission pipeline from the Badger-Wolf Farm to a point of injection on the existing Somerset Line to establish an MOAP of 125 psig;
4. If natural gas is used as the test medium in the pressure test conducted in accordance with the requirements of 20 CSR 4240-40.030(10)(G), RAES shall develop and follow a written procedure to conduct the testing in a manner consistent with protecting public safety, including but not limited to continuous monitoring of pressure gauges during the test to detect indications of leakage, and monitoring for leakage along the pipeline right-of way during the testing. A copy of this written procedure will be provided to Commission Staff for review prior to conducting the test;
5. RAES shall conduct a leakage survey before and after the pressure test to 188 psig from the Badger-Wolf Farm a point of injection on the existing Somerset Line to establish an MAOP of 125 psig;
6. All leaks from the leakage surveys must be repaired prior to operating above 100 psig;
7. RAES shall install and utilize instrumentation to continuously monitor and record the temperature of all gas sources prior to introduction into the pipeline;
8. RAES shall utilize automatic controls to limit the temperature of all gas sources introduced into the pipeline to no higher than 73°F;
9. RAES shall conduct leakage surveys with instrumented gas leakage detection equipment and patrols along the entire length of the pipeline at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year;
10. Each detected leak indication or any leak 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 as required in 20 CSR 4240-40.030(14);

11. Leaks shall be repaired as required in 20 CSR 4240-40.030(14), except that any Class 2 and Class 3 leaks must be repaired within 15 days. All Class 1 leaks shall require immediate corrective action;
12. RAES shall conduct a class location study that includes identification of any new High Consequence Areas and Moderate Consequence Areas of the RAES transmission pipeline annually, notifying Commission Staff of any class location changes within 30 days of discovery;
13. Whenever RAES is made aware (through notification by Missouri One Call, or other source) that its pipeline lies within the area described in the notice of excavation, or is within two (2) feet of such area, in addition to following the requirements of RSMo Chapter 319 to locate its line, RAES will have personnel onsite monitoring for damages to its pipeline during excavation work; and
14. These waivers of compliance (for both design pressure limit and odorization) are only applicable to the approximately 13.3 mile long intrastate gas transmission pipeline described in the RAES Application. In the event any additional segment of PE pipeline is connected to this pipeline, RAES must seek a modification of these waivers in order to operate any additional segment of PE pipeline above 100 psig, or without odorization, and shall notify Commission Staff at least 60 days prior to the start of any new gas pipeline connection.

3. On June 1, 2023, Staff filed its *Notice of Correction* noting that conditions 3 and 5 should refer to tested and surveyed pipeline as “Locust Ridge” rather than “Badger-Wolf.”

4. RAES believes that, in addition, paragraphs 3 and 5 should read that the point of injection is the “Badger-Wolf” line, as reflected in the following:


3. RAES shall perform a minimum 8 hour pressure test in accordance with 20 CSR 4240-40.030(12)(M)1.B.(I) and 20 CSR 4240-40.030(10)(G) for the intrastate transmission pipeline from the Locust Ridge Farm to a point of injection on the existing Badger-Wolf Line to establish an MOAP of 125 psig;

5. RAES shall conduct a leakage survey before and after the pressure test to 188 psig from the Locust Ridge Farm to a point of injection on the existing Badger-Wolf Line to establish an MAOP of 125 psig;

5. With the modifications identified above, RAES has no objection to the Commission approving the permanent waivers requested in the *Application* subject to the fourteen conditions requested by Staff.

WHEREFORE, RAES respectfully requests the Commission issue an Order approving the *Application* and waiver from the gas pressurization and odorization requirements of Commission Rule 20 CSR 4240-40.030 for its operation of a gas transmission line in Sullivan and Mercer Counties as requested therein, subject to the fourteen conditions requested by Staff; for a waiver of the Commission's sixty-day notice provision; and for such other relief as the Commission deems just and proper.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 2nd day of June, 2023:

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