

Johansen, Dale

From: Leonberger, Bob
Sent: Friday, April 16, 2010 9:44 AM
To: Johansen, Dale
Subject: FW: Comments for Proposed Changes to Chapter 319 - Underground Damage Prevention

Attachments: Chapter 319 Comments.doc



Chapter 319
Comments.doc (28 K)

-----Original Message-----

From: Samuel McGarrah [mailto:SMcGarrah@empiredistrict.com]
Sent: Friday, April 16, 2010 5:24 AM
To: Leonberger, Bob
Subject: Comments for Proposed Changes to Chapter 319 - Underground Damage Prevention

Bob,

Attached are Empire District Electric's comments to proposed changes to Chapter 319. I am not sure where these comments on potential proposed changes to Chapter 319 should be submitted. If you are not the correct person, please let me know.

Thanks
Sam McGarrah
Director of Engineering and Line Services Empire District Electric Co.

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

In the Matter of a Repository Docket for)	
Materials Relating to the Underground)	Case No. GW-2010-0120
Facility Damage Prevention Project.)	

**COMMENTS OF EMPIRE DISTRICT ELECTRIC COMPANY
ON POTENTIAL CHANGES TO CHAPTER 319 RSMO**

There has been a concerted effort to develop comments for modifications to Chapter 319 – Underground Damage Prevention. This effort was led by Laclede Gas Company. Empire reviewed Laclede’s proposed modifications and does agree with the majority of these comments. However, there are several suggestions by Laclede that Empire disagrees with since they would significantly impact expenses associated with our construction methods. Below are the sections in Laclede’s comments that Empire cannot support.

319.026.5 (mandatory hand dig requirement)

With the type of soil/rock within our service territory, it is very difficult to hand dig every time excavation is required inside of a marked tolerance zone. Empire has had good results from the current language in the law. The recommendation to mandate soft digging techniques for every excavation within the tolerance zone will only increase cost for our construction without causing a substantial reduction in damage.

Empire would prefer that current Missouri law remain unchanged.

319.026.2 (type of excavation work, mode and ticket size)

The proposed 500 ft. maximum is just not practical for our construction sites. 500 ft. could be less than two spans of an OH extension. The current allowable ticket size works well for our type of work.

Empire would prefer that the current ticket size allowed by MOCS remain unchanged.

319.050 (emergency locate requests)

It is not realistic in a large storm that Empire would have crews on site or that we would be able to begin excavation of any/all emergency locate requests within a specified timeframe. Storm restoration is not a static undertaking, things can change at any given time. By definition if we plan to excavate in less than the three day waiting period, under emergency conditions, it is an emergency ticket.

Empire would prefer that current Missouri law remain unchanged.

Respectfully submitted

Sam McGarrah, P.E.

Sam McGarrah

Director of Engineering and Line Services

Empire District Electric Co.

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