

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company)	
Concerning a Natural Gas Incident at)	Case No. GS-2007-0130
Premio Lane in Fenton, Missouri.)	

**AMERENUE’S RESPONSE TO STAFF’S RECOMMENDATIONS
CONTAINED WITHIN THE STAFF GAS INCIDENT REPORT**

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE”) and for its Response to the Missouri Public Service Commission’s Staff’s (“Staff”) Recommendations contained within the *Staff Gas Incident Report* (Report), states as follows:

History

1. On September 26, 2006, *Staff’s Request to Establish a Case for Investigation of Gas Safety Incident* was filed to initiate the above-captioned case.
2. On October 5, 2006, the Commission issued its *Order Granting Request to Open Case for Investigation of a Natural Gas Incident* for the purpose of receiving Staff’s Report resulting from Staff’s informal investigation of the incident which occurred in Fenton, Missouri, on September 12, 2006.
3. On January 3, 2007, Staffed filed its *Motion to Join AmerenUE* as a party to this case. AmerenUE did not object.
4. On February 2, 2007, Staff filed its Report, which contained three recommendations applicable to AmerenUE.

5. On February 23, 2007, the Commission granted Staff's Motion to Join AmerenUE and ordered the Company to respond to the recommendations contained in Staff's Report no later than March 26, 2007.

Staff's Recommendations

6. Staff's Report contained three recommendations that were directed to AmerenUE. The first recommendation stated that

...AmerenUE review the circumstances of this incident and take precautions to avoid reoccurrence when AmerenUE or its contractors are installing buried electric cables or conduits. Specifically when horizontal boring excavations are in the vicinity of a natural gas facility, AmerenUE or its contractors should verify that the location of the boring device is outside of the marked approximate location of the natural gas facility. The Staff also recommends that AmerenUE and its contractors continue to follow the statutory requirement in RSMo 319.037 (see Appendix C) that an excavator make efforts to confirm the horizontal and vertical location of a marked underground facility when horizontal boring within the marked approximate location. Staff Gas Incident Report, February 2, 2007, Exhibit A, p. 4.

7. AmerenUE agrees with and, in fact, has already taken steps to begin implement of this recommendation. The Company has reviewed the circumstances of this incident with the involved contractor, ADB Utility Contractors (ADB), immediately following the incident and again following the receipt of the Staff Recommendations. AmerenUE will schedule subsequent meetings with all underground utility contractors servicing AmerenUE to ensure awareness of this particular incident and to discuss necessary precautions to avoid recurrences in the future. AmerenUE requires compliance with the statutory requirements in Section 319.037 RSMo directing an excavator to confirm the horizontal and vertical location of a marked underground facility whenever horizontal boring within the marked approximate location of the facility.

8. Further, ADB has modified their rules and procedures in response to this incident. ADB's policy was to manually dig two feet on either side of a mark when exposing underground facilities. That policy has been modified as follows:

- Crews are now instructed to manually dig three feet on either side of a mark;
- In addition to current alarm systems on each boring machine, ADB will equip all crews with advanced hand locating devices to find marked and unmarked facilities;
- Crews will pre-test locator equipment along proposed bore route to check for interference;
- Crews will count the rods inserted during a bore as a cross reference to check bore head distance; and
- Any interference or mixed locator readings will be treated with extreme caution by all crews and the bore will not continue until these readings are clarified.

9. Staff's second recommendation stated that "...AmerenUE or its contractors call 911 in addition to Laclede (or the involved gas facility operator if not Laclede) when a natural gas facility is damaged and natural gas is escaping as required by Federal law." Staff Gas Incident Report, February 2, 2007, Exhibit A, p. 4.

10. AmerenUE agrees with this recommendation. AmerenUE has instructed ADB and all other underground directional boring contractors serving AmerenUE to immediately call 911, in addition to the operator of the involved gas facility, whenever

probable damage to a natural gas facility occurs as evidenced by the smell of escaping gas.

11. ADB has initiated the following rules and procedures and all other AmerenUE directional boring contractors will be required to do the same:

- ADB has published a detailed “Action Plan” to take following an underground facility hit including the need to contact 911 where damage to a natural gas facility has occurred. Those printed actions have been discussed with and distributed to all crew members at two separate safety meetings.
- ADB crews were provided with reminder cards and truck visor sleeves outlining the steps to take whenever a utility hit occurs with an emphasis on the danger posed by contact with a gas facility.

12. Staff recommendation three stated “...that AmerenUE review the procedures, practices, training, and number of personnel that are used for the inspection of electric cable installations by contractors to determine what revisions are needed. AmerenUE should ensure that each electric cable is installed in accordance with the Commission’s rules. The Staff recommends that AmerenUE submit the results of the review and an estimated schedule for actions to the Staff.” Staff Gas Incident Report, February 2, 2007, Exhibit A, p. 4.

13. AmerenUE accepts this recommendation. AmerenUE will review with construction supervisors and directional boring contractors the requirement and all underground electric cables installations will adhere to AmerenUE construction standards. AmerenUE will require directional drilling contractors, on all directional

boring projects, to provide a written summary confirming cable installation meets AmerenUE standards and instruction. Each job completion form will be reviewed in detail by the responsible AmerenUE construction supervisor. In addition, AmerenUE will increase construction supervisor inspections of directional bored cable installations. AmerenUE will monitor supervisor workload and adjust staffing levels when necessary. This staffing level adjustment may be done on a permanent or temporary basis as deemed appropriate.

WHEREFORE, AmerenUE respectfully requests that the Commission accept its Response to the Staff Recommendations contained within the Staff Gas Incident Report.

Respectfully submitted,
UNION ELECTRIC COMPANY
d/b/a AmerenUE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via electronic filing and electronic mail (e-mail) or via regular mail on this 26th day of March, 2007, to:

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