

Appendix to Preliminary Comments of SNGMo

| Rule | Page | Paragraph | Comment |
|------------------|------|------------|--|
| 4 CSR 240-3.270 | | (1) | Additional clarity needed - Are the welding procedures, joining procedures, and standards required to be submitted to designated commission personnel prior to construction activities on each scope of work beginning? |
| 4 CSR 240-40.020 | 2 | (3)(A) | The Company has concerns with making a determination based on only a preliminary evaluation, as this suggests that the Commission could consider “Discovery” has been established as soon as a report is called in; starting the one hour reporting clock. “Immediate Notice of Federal Incident at the earliest practicable moment following discovery, but no later than one hour after confirmed discovery” needs clarification. |
| 4 CSR 240-40.020 | 4 | (11)(C)(2) | Company welding plans are not currently submitted before general construction activities begin. It’s not clear in this change if the current process of sending Company procedures/plans to the Commission one time, or when changes happen, is acceptable. |
| 4 CSR 240-40.030 | 4 | (1)(J)(2) | How does this revision differ from the current requirement listed in (1), that each operator shall submit welding procedures, joining procedures and construction specification to the commission before the start of construction? Are the welding procedures, joining procedures, and standards required to be submitted to designated commission personnel prior to construction activities on each scope of work beginning? Additional clarity needed. |
| 4 CSR 240-40.030 | 5 | (5)(C)(1) | What is the definition of “Welding Operator”? |
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