



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

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400 Seventh St., S.W.
Washington, D.C. 20590

AUG 14 2001

Missouri Public
Service Commission

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AUG 21 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
PO BOX 360
Jefferson City MO 65102-0360

Adjudication Division
Missouri Public Service Commission

Ex Parte? *Not R*

Dear Mr. Roberts:

*Presiding in
to Judge*

This concerns the Commission's order in Case No. GE-2001-586 granting Missouri Public Service (MPS) a waiver of state pipeline safety rules and 49 CFR 192.619(a)(2)(ii). The waiver allows MPS to uprate a 3-mile segment of gas pipeline from 118 psig to 175 psig without pressure testing the segment to one and a half times 175 psig, or 262.5 psig.

MPS sought the waiver because of difficulties in pressurizing the line segment above 175 psig. The primary difficulty is that the 3-mile segment is part of a single line feeding the City of Nevada, and shutting down the line for pressure testing would disrupt the city's gas supply.

We note that under temporary permission of the Commission, the 3-mile segment passed an uprating procedure involving staged pressure increases to 175 psig, with a leak survey at each stage. We also note that the gas is odorized and operation of the segment at 175 psig corresponds to merely six percent of the specified minimum yield strength of the pipe. Further, the Commission has required annual instrumented leakage surveys of the segment. In consideration of these factors, we agree with the Commission that the waiver is in the public interest and will not compromise safety. Therefore, we have no objection to the waiver.

Sincerely,

[Signature]
Stacey L. Gerard
Associate Administrator
for Pipeline Safety

4