

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

In the Matter of the Establishment of a Working Case)
for the Review and Consideration of Amending) **File No. GW-2025-XXXX**
the Commission’s Natural Gas Safety Rules)

STAFF MOTION TO ESTABLISH WORKING CASE

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its *Staff Motion to Establish Working Case* states as follows:

1. Staff requests the Commission open a working docket for the purpose of updating the Commission’s gas safety rules to reflect recent U.S. Department of Transportation rule changes and reflect certain clarifications and editorial revisions.

2. Federal law requires that the State of Missouri take measures to adopt each applicable federal pipeline safety standard within a prescribed period of time.¹ Goals are set for state programs by the Pipeline and Hazardous Materials Administration (PHMSA) and enforcement of those goals is by reductions in federal grant-in-aid funding and the potential loss of federal certification if those goals are not met.²

3. Staff has considered the Federal Rule amendments published as final rules subsequent to the draft rule amendments filed in Case No. GW-2023-0272 and subsequently promulgated in Case No. GX-2023-0422. Staff is proposing to adopt these Federal Rule amendments into the Commission’s rules except as described in Attachment A.

¹ 49 U.S. Code § 60105 requires, among other things, that the state authority adopt each applicable federal pipeline safety standard by the date of its annual certification, or in the event a standard was established within 120 days before the date of the certification, be taking steps to adopt that standard.

² The Commission’s Safety Engineering Department Staff is granted authority to implement the state pipeline safety program by annual certification from the U.S. Department of Transportation (DOT). The annual certification contemplates that a state agency may adopt a safety standard that is additional to or more stringent than the applicable federal standards.

4. Staff is also proposing additional amendments to correct, clarify, and update certain provisions of 20 CSR 4240-40.020 and 20 CSR 4240-40.030 as described in Attachments B and C.

5. Staff's Motion further requests the Commission invite stakeholders to respond with comments regarding the proposed gas safety rule amendments in Attachments A, B, and C, and the cost impact, if any, of the proposed gas safety rule amendments by November 1, 2024.

6. Attached is an updated service list of all stakeholders from the previous gas safety rules working docket, Case No. GW-2023-0272, attached hereto and labeled as Attachment D. Staff requests the Commission direct its data center to provide notice of this working case and invitation to comment to all stakeholders listed on Attachment D.

7. Staff believes that since the service list includes over 60 stakeholders, establishment of Working Case will be the most efficient and transparent method to a. provide information on the proposed amendments to interested stakeholders and the public, and b. receive and consider stakeholder and public comments.

8. Following consideration of stakeholder and public comments, Staff will finalize a draft of the proposed rule amendments for filing in a Rulemaking Case.

WHEREFORE, Staff respectfully requests the Commission to issue an order that: 1) opens a working docket to address the attached proposed natural gas safety rule amendments with notice provided to those in the attached service list; and 2) invites stakeholders in this docket to submit comments regarding the proposed rule amendments and their cost impact, if any, and to do so by November 1, 2024.

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey

Deputy Counsel

Missouri Bar No. 59027

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-522-6279

573-751-9285 (Fax)

scott.stacey@psc.mo.gov

**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 6th day of September, 2024.

/s/ J. Scott Stacey

Attachment A
Proposed Adoption of Recent Federal Amendments

Federal law requires that the State of Missouri take measures to adopt each applicable federal pipeline safety standard within a prescribed period of time.¹ Goals are set for state programs by the Pipeline and Hazardous Materials Administration (PHMSA) and enforcement of those goals is by reductions in federal grant-in-aid funding and the potential loss of federal certification if those goals are not met.²

The Missouri Public Service Commission Staff (“Staff”) has considered the Federal Rule amendments published as final rules subsequent to the draft rule amendments filed in Case No. GW-2023-0272, and subsequently promulgated in Case No. GX-2023-0422. Staff is proposing to adopt these Federal Rule amendments into the Commission’s rules:

1. United States, Department of Transportation, Pipeline and Hazardous Materials Safety Administration. “Pipeline Safety: Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments” [Docket No. PHMSA-2016-0002; Amdt. Nos. 192-135; 195-107]. 89 FR 33264 (April 29, 2024).

Staff proposes to adopt the amendments to 49 CFR 192 in 20 CSR 4240-40.030, except as stated below.

These amendments are in the currently effective federal regulations at 49 CFR:

- 192.3 Definitions.
- 192.7 What documents are incorporated by reference partly or wholly in this part?
- 192.11 Petroleum gas systems.
- 192.13 What general requirements apply to pipelines regulated under this part?
- 192.112 Additional design requirements for steel pipe using alternative maximum allowable operating pressure.
- 192.113 Longitudinal joint factor (E) for steel pipe.
- 192.121 Design of plastic pipe.
- 192.145 Valves.
- 192.147 Flanges and flange accessories.
- 192.153 Components fabricated by welding.
- 192.163 Compressor stations: Design and construction.
- 192.225 Welding procedures.
- 192.279 Copper pipe.

¹ 49 U.S. Code § 60105 requires, among other things, that the state authority adopt each applicable federal pipeline safety standard by the date of its annual certification, or in the event a standard was established within 120 days before the date of the certification, be taking steps to adopt that standard.

² The Commission’s Safety Engineering Department Staff is granted authority to implement the state pipeline safety program by annual certification from the U.S. Department of Transportation (DOT). The annual certification contemplates that a state agency may adopt a safety standard that is additional to or more stringent than the applicable federal standards.

Attachment A
Proposed Adoption of Recent Federal Amendments

- 192.714 Transmission lines: Repair criteria for onshore transmission pipelines.
- 192.727 Abandonment or deactivation of facilities.
- 192.903 What definitions apply to this subpart?
- 192.907 What must an operator do to implement this subpart?
- 192.911 What are the elements of an integrity management program?
- 192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?
- 192.921 How is the baseline assessment to be conducted?
- 192.923 How is direct assessment used and for what threats?
- 192.925 What are the requirements for using External Corrosion Direct Assessment (ECDA)?
- 192.927 What are the requirements for using Internal Corrosion Direct Assessment (ICDA)?
- 192.933 What actions must be taken to address integrity issues?
- 192.935 What additional preventive and mitigative measures must an operator take?
- 192.937 What is a continual process of evaluation and assessment to maintain a pipeline's integrity?
- 192.939 What are the required reassessment intervals?
- Appendix B to Part 192—Qualification of Pipe and Components

Exceptions: Staff proposes the following changes when adopting the federal regulations into 20 CSR 4240-40.030:

- Staff is not proposing to adopt changes to 49 CFR 192.112 because alternative maximum allowable operating pressures have not been adopted for use in the Commission's rule.
- Staff is not proposing to adopt changes to 49 CFR 192.121(d)(2)(iv) or 49 CFR 192.121(e)(4) because these paragraphs pertain to Polyamide (PA) pipe, which has not been adopted for use in the Commission's rule.

2. United States, Department of Transportation, Pipeline and Hazardous Materials Safety Administration. “Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards: Response to Petition for Reconsideration; Additional Technical Corrections” [Docket No. PHMSA-2013-0255; Amdt. No. 192-136]. 89 FR 53877 (June 28, 2024).

Attachment A
Proposed Adoption of Recent Federal Amendments

Staff proposes to adopt the amendments to 49 CFR 192 in 20 CSR 4240-40.030, except as stated below.

These amendments are in the currently effective federal regulations at 49 CFR:

- 192.617 Investigation of failures and incidents.
- 192.635 Notification of potential rupture.

Exceptions: Staff proposes the following changes when adopting the federal regulations into 20 CSR 4240-40.030:

- The Commission’s rule does not apply to offshore gas transmission pipelines, so previously when the term “onshore transmission pipeline” or “onshore gas transmission pipeline” was included in 49 CFR 192 amendments, the word “onshore” has been excluded when adopting those amendments. Staff proposes to use the wording “gas transmission pipeline” in place of the term “onshore gas transmission pipeline” when adopting these 49 CFR 192 amendments.

3. United States, Department of Transportation, Pipeline and Hazardous Materials Safety Administration. “Pipeline Safety: Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments; Technical Correction” [Docket No. PHMSA-2016-0002; Amdt. No. 192-137]. 89 FR 53880 (June 28, 2024).

Staff proposes to adopt the amendments to 49 CFR 192 in 20 CSR 4240-40.030.

These amendments are in the currently effective federal regulations at 49 CFR:

- 192.121 Design of plastic pipe.

Attachment B
Staff Proposed Amendments to 20 CSR 4240-40.020

The Missouri Public Service Commission Staff are proposing amendments to 20 CSR 4240-40.020 to update incident reporting thresholds for inflation, PHMSA form revision dates for forms incorporated by reference, and various editorial corrections as follows:

1. Adjust Reporting Threshold for Missouri Incidents as Defined in 20 CSR 4240-40.020 (4)(A)1. for Inflation.

In Commission Case No. GW-2022-0237, commenters requested adjustment of the \$10,000 reporting threshold for Missouri Incidents for inflation. Staff agreed, and proposed adjusting the reporting threshold to \$17,500 to account for inflation between November 30, 1998 and March 2022. This increase in the reporting threshold was included in the rule amendments promulgated in Commission Case No. GX-2022-0340. Staff is now proposing to adjust for inflation through June 2024, using the same methodology described in the June 3, 2022, Case No. GW-2022-0237 workshop whitepaper. Specifically:

$$\begin{aligned} & \text{Estimated damage cost present} \\ & = \text{Estimated damage cost in 1998} * \frac{(\text{CPI} - \text{U, June 2024})}{(\text{CPI} - \text{U, November 1998})} \end{aligned}$$

Where CPI-U is Consumer Price Index – Urban. Using a data set of Consumer Price Index US City Average (1982-1984 = 100) from the U.S. Bureau of Labor Statistics:

- CPI-U, November 1998 = 164.0, and
- CPI-U, June 2024 = 314.175.

Substituting into the equation:

$$\text{Estimated damage cost present} = \$10,000 * \frac{(314.175)}{(164.0)}$$

$$\text{Estimated damage cost present} = \$19,157.01$$

Attachment B
Staff Proposed Amendments to 20 CSR 4240-40.020

Rounding the result of \$19,157.01 to the nearest \$100 results in a value of \$19,200. Staff is proposing to revise the currently effective \$17,500 value to \$19,200 to adjust for inflation.

2. Adjust Reporting Threshold for Federal Incidents as Defined in 20 CSR 4240-40.020(2)(D) for Inflation.

PHMSA adjusts the estimated property damage threshold for inflation in accordance with Appendix A to 49 CFR 191 and the changes to the reporting threshold are posted on PHMSA's website. Appendix A to 49 CFR 191 states that each year a notice will be published to PHMSA's website announcing updates to the property damage threshold. The update will take place on July 1 of that year and remain in effect until June 30 of the next year.

On February 15, 2024, PHMSA published the property damage threshold update of \$145,400 for July 1, 2024 through June 30, 2025. Staff is proposing to update the currently effective Federal Incident estimated property damage threshold of \$129,300 in 20 CSR 4240-40.020(2)(D)1.B. to \$145,400 to match the updated PHMSA property damage threshold.

3. Removal of In-Text References to Federal Rules

In a previous rulemaking, the Missouri Public Service Commission Staff received feedback from JCAR regarding in-text references in 20 CSR 4240-40.020 and 20 CSR 4240-40.030 to the federal equivalent rules. Staff stated that in a future rulemaking, Staff would remove in-text references to federal rules that were in parentheses that followed the Missouri references in the body of the rules. The references to federal rule equivalents in the headers (e.g. subsection headers) would be kept.

4. Updates of PHMSA Form Revision Dates Incorporated by Reference in 20 CSR 4240-40.020(5)(G)

A number of the PHMSA forms incorporated by reference in 20 CSR 4240-40.020(5)(G) have been revised from the versions currently incorporated by reference. Staff is proposing

Attachment B
Staff Proposed Amendments to 20 CSR 4240-40.020

to update the revision dates to the currently available forms at the time proposed amendments are filed.

5. Editorial Corrections

Staff is proposing to update in-text references to rule requirements in 20 CSR 4240-40.030 throughout 20 CSR 4240-40.020. This change is to more precisely reference amendments that were made during the previous rulemaking to 20 CSR 4240-40.030.

Attachment C
Staff Proposed Amendments to 20 CSR 4240-40.030

In addition to the proposed amendments discussed in Attachment A to adopt recent federal amendments to 49 CFR 192 in 20 CSR 4240-40.030, the Missouri Public Service Commission Staff are proposing amendments to 20 CSR 4240-40.030. The proposed amendments include amendments, editorial corrections, and clarifications as follows:

1. Modification of Delivery of Excavator Education Mailings to Include First Class Mail

20 CSR 4240-40.030(12)(I)3.B. requires each operator to provide certain information to persons who normally engage in excavation activities as identified in subparagraph (12)(I)3.A. Currently this rule requires that at least once each calendar year at intervals not exceeding fifteen (15) months each operator provide the required information by registered or certified mail, or notification through participation in an excavator education program of a one-call notification center meeting the requirements of subparagraph (12)(I)3.C. The provisions in subparagraph (12)(I)3.C.(II) allow the one call system's excavator education program to provide educational mailings to excavators by first class mail. For this reason, Staff is proposing to add the option of first class mail to the excavator education material delivery methods available to operators. Staff proposes the following revisions to 20 CSR 4240-40.030(12)(I)3.B.:

B. Provide for at least a semiannual general notification of the public in the vicinity of the pipeline. Provide for actual notification of the persons identified in subparagraph (12) (I)3.A., at least once each calendar year at intervals not exceeding fifteen (15) months by **first class,** registered, or certified mail, or notification through participation in an excavator education program of a one-call notification center meeting the requirements of subparagraph (12)(I)3.C. Mailings to excavators shall include a copy of the applicable sections of Chapter 319, RSMo, or a summary of the provisions of Chapter 319, RSMo, approved by designated commission personnel, concerning underground facility safety and damage prevention pertaining to excavators. The operator's public notifications and excavator notifications shall include information concerning the existence and purpose of the operator's damage prevention program, as well as information on how to learn the location of underground pipelines before excavation activities are begun;

Attachment C
Staff Proposed Amendments to 20 CSR 4240-40.030

2. Reorganization and Clarification of 20 CSR 4240-40.030(2)(B)

Staff proposes to reorganize 20 CSR 4240-40.030(2)(B) to improve clarity, and to provide references to existing rule citations regarding the use of composite materials as follows:

(B) General. (192.53)

1. Materials for pipe and components must be ~~[-]~~:

[1/A]. Able to maintain the structural integrity of the pipeline under temperature and other environmental conditions that may be anticipated;

[2/B]. Chemically compatible with any gas that they transport and with any other material in the pipeline with which they are in contact;

[3/C]. Qualified in accordance with the applicable requirements of this section; **and**

[4/D]. Only of steel or polyethylene for pipe for the underground construction of pipelines, except: ~~[that other previously]~~

(I) Previously qualified materials may be used for repair of pipe constructed of the same material; and

(II) Composite materials as defined in subsection (1)(B) may be used for pipe in Type C gathering lines when permitted by paragraph (1)(E)2. and subject to prior notifications to PHMSA and designated commission personnel in accordance with paragraph (1)(E)2. and subsection (1)(M).

[5/2]. Other piping materials may be used with approval of the commission.

3. Clarification of Information Required in Public Awareness Notifications

Staff proposes to amend 20 CSR 4240-40.030(12)(K)1. to provide additional clarity by separating requirements to provide customers notifications semiannually by mailings or hand-delivered messages from the requirement for notifications nine (9) times each calendar year by billing messages. Currently, these requirements are listed in the same subparagraph, however different actions are required to comply with each requirement. Staff additionally proposes to revise 20 CSR 4240-40.030(12)(K)1. to clarify the information required to be included in each required public awareness notification. Staff proposes the following revisions to 20 CSR 4240-40.030(12)(K)1.:

(K) Public Awareness. (192.616)

Attachment C
Staff Proposed Amendments to 20 CSR 4240-40.030

1. Except for an operator of a master meter system covered under paragraph (12)(K)10., each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the *American Petroleum Institute's (API) Recommended Practice (RP) 1162* (incorporated by reference in 49 CFR 192.7 and adopted in subsection (1)(D)). In addition, the program must provide for notification of the intended groups **[on]** **according to** the following **[schedule]**:

- A. Appropriate government organizations and persons engaged in excavation related activities must be notified at least annually;
- B. The public must be notified at least semiannually; **[and]**
- C. Customers must be notified at least semiannually by mailings or hand-delivered messages; **[and]**
- D. Customers must be notified** at least nine (9) times **[a]** **each** calendar year by billing messages; **[.]**
- E. Notifications required by subparagraphs (12)(K)1.A. – (12)(K)1.C. must at a minimum include the information required by paragraphs (12)(K)4. and (12)(K)5.; and**
- F. Notifications required by subparagraph (12)(K)1.D. must at a minimum include information required by subparagraphs (12)(K)4.A. and (12)(K)4.E.**

4. **Addition of Language in Paragraph (8)(Q)2. to Reference the Definition for “replaced service line” in Paragraph (8)(P)1.**

The term “replaced service line” is defined in paragraph (8)(P)1. for subsection (8)(P). The term “replaced service line” is also used in paragraph (8)(Q)2. Staff proposes to add language to paragraph (8)(Q)2. to reference the definition of a “replaced service line” in (8)(P)1. Staff proposes the following revision to 20 CSR 4240-40.030(8)(Q)2.:

(Q) Manual Service Line Shut-Off Valve Installation (192.385)

2. *Installation requirement.* The operator must install either a manual service line shut-off valve or, if possible, based on sound engineering analysis and availability, an EFV for any new or replaced service line with installed meter capacity exceeding 1,000 SCFH, **where replaced service line is defined in paragraph (8)(P)1.**

5. Addition of Test Durations to Record Requirements for Tests of Service Lines and Record Requirements for Tests under Paragraph (10)(B)4.

Currently, operators are required to document the “test pressure, leaks, and failures and their disposition and the date” for tests performed on service lines under subsections (10)(F) and (G). Staff believes that the test duration and the results of leak tests required by paragraph (10)(B)4. are pertinent information that should also be documented. . Staff proposes the following revision to 20 CSR 4240-40.030(10)(I):

(I) Records. (192.517)

.....

2. For service lines, each operator shall make and retain for the useful life of the pipeline, a record of each test performed under subsections (10)(F) and (G) (192.511 and 192.513). Where applicable to the test performed, the record must contain the test pressure, **test duration**, leaks, and failures noted and their disposition and the date.

3. Each operator shall make and retain for the useful life of the pipeline, a record of each test performed under paragraph (10)(B)4.

6. Removal of In-Text References to Federal Rules

In a previous rulemaking, the Missouri Public Service Commission Staff received feedback from JCAR regarding in-text references in 20 CSR 4240-40.020 and 20 CSR 4240-40.030 to the federal equivalent rules. Staff stated that in a future rulemaking, Staff would remove in-text references to federal rules that were in parentheses that followed the Missouri references in the body of the rules. The references to federal rule equivalents in the headers (e.g. subsection headers) would be kept.

7. Editorial Corrections

Staff is proposing to make editorial corrections throughout 20 CSR 4240-40.030, including updating in-text citations in 20 CSR 4240-40.030 to more precisely cite the applicable requirements, and adding omitted punctuation marks.

Attachment C
Staff Proposed Amendments to 20 CSR 4240-40.030

8. Addition of Omitted Federal Rule Equivalent References in Subsection Headers

References to federal rule equivalents have consistently been included in subsection headers for subsections that have a federal rule equivalent. These references were accidentally omitted from the headers for 20 CSR 4240-40.030(13)(X) and (17)(E). Staff proposes the following revisions to the headers for 20 CSR 4240-40.030(13)(X) and (17)(E):

(X) Transmission Lines—Valve Shut-Off for Rupture Mitigation. **(192.634)**

Attachment D
Stakeholder Service List

MISSOURI PUBLIC SERVICE COMMISSION
Service List

Missouri Public Service Commission

Staff Counsel Department 200
Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

City Utilities of Springfield, Missouri

Legal Department
301 E. Central
P.O. Box 551
Springfield, MO 65801
info@cityutilities.net

Dogwood Energy, LLC

Attn: EH&S Coordinator
P.O. Box 110
Pleasant Hill, MO 64080

Empire District Gas Company, The

Legal Department
P.O. Box 127
602 S. Joplin Avenue
Joplin, MO 64802

Liberty Utilities (MNG)

Legal Department
P.O. Box 127
602 S. Joplin Avenue
Joplin, MO 64802

Spire, Inc.

Legal Department
700 Market Street, 6th Floor
St. Louis, MO 63101

Summit Natural Gas of Missouri, Inc.

Legal Department
2 Delorme Drive, Suite 100
Yarmouth, ME 04096

Union Electric Company

Legal Department
1901 Chouteau Avenue
P.O. Box 66149, Mail Code 1310
St. Louis, MO 63166
AmerenMOService@ameren.com

Albany Municipal Gas System

Attn: City Administrator
106 E. Clay Street
Albany, MO 64402

Altenburg-Frohna Municipal Gas System

Attn: Mayor of Frohna
Joint Utilities Gas Department
Frohna, MO 63748

Altenburg-Frohna Municipal Gas System

Attn: Mayor of Altenburg
9144 Main Street
P.O. Box 22
Altenburg, MO 63732

Ashley Energy, LLC

Attn: Operations Manager
One Ashley Place
St. Louis, MO 63102

Ameresco

Attn: Manager of Operations
111 Speen St. Ste. 410
Framingham, MO 01701

Bernie Municipal Gas System

Attn: Mayor of Bernie
P.O. Box 605
101 W. Main Street
Bernie, MO 63822

Bethany Municipal Gas System

Attn: City Administrator
P.O. Box 344 206 N. 16th Street
Bethany, MO 64424

Bismarck Municipal Gas System

Attn: Mayor of Bismarck
P.O. Box 27
924 Center Street
Bethany, MO 63624

Clarence Municipal Gas System

Attn: Mayor of Clarence
P.O. Box 9
Clarence, MO 63437

Cuba Municipal Gas System

Attn: Mayor of Cuba
City Hall
P.O. Box K
202 N. Smith Street
Cuba, MO 65453

Fulton Municipal Gas System

Attn: Director of Administration
P.O. Box 130
4th & Market Streets
Fulton, MO 65251

Granby Municipal Gas System

Attn: Mayor of Granby
P.O. Box 500
302 N. Main Street
Granby, MO 64844

Attachment D
Stakeholder Service List

Grant City Municipal Gas System

Attn: Mayor of Grant City
101 W. 3rd Street
P.O. Box 398
Grant City, MO 64456

Green City Municipal Gas System

Attn: Mayor of Green City
P.O. Box 235
#4 Green Street
Green City, MO 63545

Hermann Municipal Gas System

Attn: Public Works Director
1902 Jefferson Street
Hermann, MO 65041

John Knox Village

Attn: Manager of Facilities
400 NW Murray Rd.
Lee's Summit, MO 64081

Kennett Municipal Gas System

Attn: Superintendent of Utilities
P.O. Box 40
303 S. Anthony
Kennett, MO 63857

Ladsonia Ethanol Plant

Attn: CFO and VP of Admin Services
Missouri Public Utility Alliance
1808 I-70 Dr., S.W.
Columbia, MO 65203

Liberal Municipal Gas System

Attn: Mayor of Liberal
P.O. Box 67
209 S. Main Street
Liberal, MO 64762

Linden Mobile Home Park

Attn: Mr. Jim Janecek
400 NE 76th Terrace
Kansas City, MO 64118

Macon Municipal Gas System

Attn: Mayor of Macon
P.O. Box 569
106 W. Bourke Street
Macon, MO 63552

Madison Municipal Gas System

Attn: Mayor of Madison
P.O. Box 141
209 S. Main Street
Madison, MO 65263

Marshall Municipal Utilities

Attn: Underground
Facilities Director
75 East Morgan Street
Marshall, MO 65340

Mercer Municipal Gas System

Attn: Mayor of Mercer
City Hall
14402 State Street
Mercer, MO 64661

Middletown Municipal Gas System

Attn: Mayor of Middletown
City Hall
P.O. Box 127
203 Johnson Street
Middletown, MO 63359

Mid-Missouri Energy

Attn: Ryland Utlaut, President
15311 N. Saline 65 Hwy.
Malta Bend, MO 65339

Milan Municipal Gas System

Attn: Mayor of Milan
City Hall
P.O. Box 247
212 East Second Street
Milan, MO 63556

Monroe City Municipal Gas System

Attn: Mayor of Monroe City
City Hall
109 2nd Street
Monroe City, MO 63456

Montgomery City Municipal Gas System

Attn: Mayor of Montgomery City
723 North Sturgeon Street
Montgomery City, MO 63361

New Florence Municipal Gas System

Attn: Mayor of New Florence
P.O. Box 70
217 South Main Street
New Florence, MO 63363

New Haven and Berger Municipal Gas System

Attn: Mayor of Berger
404 Rosalie
Berger, MO 63014

New Haven Berger Municipal Gas System

Attn: Mayor of New Haven
City Hall
101 Front Street
New Haven, MO 63068

Perryville Municipal Gas System

Attn: City Administrator
215 North West Street
Perryville, MO 63775

Attachment D
Stakeholder Service List

Perry Municipal Gas System

Attn: Mayor
P.O. Box 280
127 E. Main Street
Perry, MO 63462

Paris Municipal Gas System

Attn: City Superintendent
25804 Business Highway
24
Paris, MO 65275

Plattsburg Municipal Gas System

Attn: City Administrator
114 Maple Street
Plattsburg, MO 64477

Potosi Municipal Gas System

Attn: Mayor of Potosi
121 E. High Street
Potosi, MO 63664

Princeton Municipal Gas System

Attn: Mayor of Princeton
City Hall
507 West Main Street
Princeton, MO 64673

Richland Municipal Gas System

Attn: Mayor of Richland
P.O. Box 798
Richland, MO 65556

Saint Louis University

Attn: Mr. Michael Lucido
3545 Lindell Boulevard
Wool Center Room
223 St. Louis, MO 63103

Shelbina Municipal Gas System

Attn: Mayor of Shelbina
P.O. Box 646
116 East Walnut
Shelbina, MO 63468

Show-Me Ethanol, LLC

Attn: General Manager
26530 Hwy., 24 E.
Carrollton, MO 64633

Roeslein Alternative Energy Services

Attn: President
9200 Watson Rd., Ste. 200
St. Louis, MO 63126

St. James Municipal Gas System

Attn: Mayor of St. James
P.O. Box 426
200 N. Bourbeuse Street
St. James, MO 65559

St. Robert Municipal Gas System

Attn: Mayor of St. Robert
194 Eastlawn Ave., Ste. A
St. Robert, MO 65584

Stanberry Municipal Gas System

Attn: City Administrator
130 W. First Street
Stanberry, MO 64489

Unionville Municipal Gas System

Attn: Mayor of Unionville
P.O. Box 255
1611 Grant Street
Unionville, MO 63565

Waynesville Municipal Gas System

Attn: City Administrator
100 Tremont Drive
Waynesville, MO 65583

Wheaton Municipal Gas System

Attn: Mayor of Wheaton
P.O. Box 70
219 E. Main Street
Wheaton, MO 64874

Missouri One Call System

Attn: Randy
Norden
824 Weathered
Rock Rd.
Jefferson City, MO 65101

Museum Hill Apartments

Attn: Joy Scharnhorst
Senior Asset Manager-
Fulson Asset Management
220 NW Executive Way
Lee's Summit, MO 64063

Omega Pipeline Company, LLC

Attn: Scott Smith
3773 Richmond Avenue, Suite 300
Houston, TX 77046

Utility Safety & Design, Inc.

Attn: Vice President of Engineering
P.O. Box 206
28847 Hwy. 136
Unionville, MO 63565