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**From:** Brett Johnson <[btj2006@hotmail.com](mailto:btj2006@hotmail.com)>  
**Sent:** Thursday, March 13, 2025 3:35:56 PM  
**To:** Hahn, Kayla <[Kayla.Hahn@psc.mo.gov](mailto:Kayla.Hahn@psc.mo.gov)>  
**Subject:** Gas Line Safety

Commission Chair Hahn,

My name's Brett Johnson and I'm a Missouri resident living a bit outside of Joplin. I'm writing you today about 20 CSR 4240-40 Gas Utility and Gas Safety Standards and more specifically the minimum standards of leak detection and required actions for those who own these lines.

I'm of the opinion that current interpretation of the regulations definition for "reasonable" detection have not kept pace with the reduced cost and increased accuracy of detection equipment available to both actively and passively operate. Cavity ring-down spectroscopy is significantly more accurate yet the use of older handheld devices is still widely used as it's allowed in the 2/29/24 update to your Public Service Commission's 4240-40 document. Whereas the use of passive sensing equipment installed at reasonable locations combined with a public facing reporting system would provide appropriate level of oversight for this public utility transporting hazardous material.

Additionally, the current provisions for Gas Leaks (Section 14.C) are inadequate standards to set. Specifically Class 3 leaks which are defined as not constituting a hazard to property or the general public... includes any leak what has a reading up to 50% of gas in air as close as 5' to a building. A few problems with that. #1 that's a pretty formidable leak to be detected in open air without being considered a hazard. #2 This is Missouri and we do not stay inside buildings all day. #3 the remediation for being low key toxic fogged is "fix it within 5 years". That is just a ridiculously bar to set to protect your contitutents.

Modernizing the reasonable standard set for leak detection by your agency will not only reduce harm to pregnancies from Benzene... it'll help check inflated cost due to wasted venting of the thousands of miles of semi-leaky pipes all around us. The gas company will be able to employ more Missourians to keep the economy moving while reducing costs and improving public health and stopping the unregulated venting of a significant greenhouse trapping emission in the air.

This feels like a no-brainer and exactly what your commission is designed to do. Please implement the appropriate advanced leak detection and remediation changes as soon as you are able to, and let me know if I can be of further assistance by increasing public support or providing a more formal request to the entire commission regarding this issue.

Thanks for looking into thisGas u,

Brett Johnson, PE