



Commissioners

SHEILA LUMPE
Chair

CONNIE MURRAY

KELVIN L. SIMMONS

STEVE GAW

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

June 21, 2001

WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GS-2001-224

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO DIRECT RESPONSE OF MISSOURI GAS ENERGY.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Eric William Anderson
Assistant General Counsel
(573) 751-7485
(573) 751-9285 (Fax)
eanderso@mail.state.mo.us

EWA:ccl
Enclosure
cc: Counsel of Record

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

FILED²

JUN 21 2001

**Missouri Public
Service Commission**

In the Matter of Missouri Gas Energy)
regarding an incident at 1426 W. 50th)
Terrace, Kansas City, Missouri on August)
8, 2000.)

Case No. GS-2001- 224

MOTION TO DIRECT RESPONSE OF MISSOURI GAS ENERGY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion to Late File a Response and Leave Case Open states:

1. The Missouri Public Service Commission ("Commission") established a case, under its jurisdiction pursuant to Section 393.140 RSMo 2000, for the purpose of receiving information from Missouri Gas Energy ("MGE") on the natural gas flash fire, which occurred in an excavation in front of 1426 W. 50th Terrace in Kansas City, Missouri on Tuesday, August 8, 2000, at approximately 4:25 p.m.

2. As a result of the flash fire, two contractor workers working for MGE received burns. One worker was transported to a nearby hospital and was treated for 1st, 2nd, and 3rd degree burns on his face and arms, and was released to recuperate at home. The other worker was severely burned and was transported to the Kansas University Burn Center in Kansas City, Kansas where he remained for nine days for treatment and skin grafts.

3. On February 7, 2001, Staff filed an incident report.

4. On March 8, 2001, MGE filed its response.

5. On March 20, 2001, the Commission adopted an Order Closing Case. The Order provided that Staff had not filed a response to MGE's response and that the case could be closed on March 31, 2001.

6. On March 30, 2001, Staff filed a motion to late file response and keep case open, as Staff still has concerns that have not been satisfied by MGE's response to Staff's Incident Report. Included in Staff's comments was a request for MGE to respond with clarifications concerning MGE'S requirements and training regarding the use of personal protective equipment ("PPE") and the practical elimination of all potential ignition sources in and around an excavation where there is a possibility for the accidental release of natural gas.

7. The Staff would like to reiterate the importance of receiving this information so the Staff can determine whether MGE's existing requirements and training are adequate to address these issues.

8. MGE stated that their existing requirements and training are consistent with Staff's recommendation that PPE be required for any type of operation conducted on "live gas" piping where there is a potential for the accidental release of natural gas, including projects involving abandonment's and "live" tie-ins. MGE further stated that they believe that any revisions to their existing requirements or training are not necessary.

9. The Staff needs to determine that MGE's existing requirements and training address the use of PPE during the action of loosening the plug in the tapping tee as was the case in the incident. In the incident, the contractor worker was allowed to remove his PPE prior to attempting to loosen the plug. Staff's recommendation was meant to include the use of PPE during the operation of loosening the nut, since this action has and did have the potential for the accidental release of natural gas. MGE's *Response* did not specify that their existing requirements and training address the use of PPE during this operation, and Staff needs this to be included.

10. MGE stated that their existing requirements and training meet Staff's recommendation concerning the practical elimination of all potential ignition sources in and around an excavation where there is a possibility for the accidental release of natural gas.

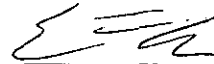
11. In the incident, there was conflicting information where the electrically operated heating irons were located in relationship to the excavation and whether the heating irons were operating. The Staff is unsure whether MGE's existing requirements and training address the possibility of operating heating irons being located near an excavation where there is a potential for the accidental release of natural gas. The Staff needs further clarification to make sure this issue is addressed by MGE.

12. Staff requests that MGE respond to these issues with a detailed explanation of the requirements and training that specifically address what operations, including operations in which the tapping tee nut is loosened, require the use of PPE and the elimination of potential ignition sources, including the location of operating heating irons.

WHEREFORE, the Staff respectfully requests that the Commission direct Missouri Gas Energy to respond to Staff's comments contained herein, concerning the incident at 1426 W. 50th Terrace, Kansas City, Missouri.

Respectfully submitted,

DANA K. JOYCE
General Counsel

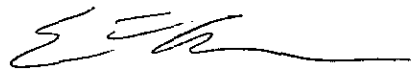


Eric William Anderson
Assistant General Counsel
Missouri Bar No. 47253

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7485 (Telephone)
(573) 751-9285 (Fax)
eanderso@mail.state.mo.us

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 21st day of June 2001.



Service List for
Case No. GS-2001-224
June 21, 2001 (ccl)

Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102

Robert J. Hack
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111