

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

In the Matter of the Application of Mid South)
Missouri, LLC for a Permanent Waiver from) **File No. GE-2026-0084**
Certain Provisions of 20 CSR 4240-40.030)

STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission, through counsel, and states as follows.

1. On September 9, 2025, Mid South Missouri, LLC (MSM) filed an application requesting Commission approval for a waiver of odorization requirements under Commission Rule 20 CSR 4240-40.030 in operation of a gas transmission line in Stoddard County, Missouri.

2. On September 30, 2025, the Commission ordered the Staff to file a recommendation regarding the Application, or a status report indicating when it will file its recommendation by November 14, 2025.

3. Attached is Staff's Status Report Marked as Appendix A. As stated in the Status Report, Staff is actively engaged in obtaining necessary information to finalize its recommendation, and much of that information is not due to Staff until December, 2025.

4. Staff proposes to submit its recommendation or a status report by January 30, 2026, which should allow time to fully investigate the issues in this matter.

WHEREFORE, Staff submits its Status Report for the Commission's information and consideration, and respectfully requests the Commission give Staff until January 30, 2026, to submit its recommendation or another status report in this matter.

Respectfully submitted,

/s/Douglas W. Hennon

Douglas W. Hennon

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**Attorney for Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 13th day of November, 2023.

/s/ Douglas W. Hennon

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GE-2026-0084, Mid South Missouri, LLC

FROM: Christopher Fitch, Assistant Engineer, Safety Engineering Department
Gregory Williams, Associate Engineer, Safety Engineering Department
Kathleen McNelis, P.E., Engineer Manager, Safety Engineering Department

/s/ Kathleen McNelis / 11/13/2025
Safety Engineering Department/ Date

SUBJECT: Staff's Status Report Regarding the Application of Mid South Missouri, LLC for a
Permanent Waiver from Certain Provisions of 20 CSR 4240-40.030.

DATE: November 13, 2025

On September 29, 2025, Mid South Missouri, LLC ("MSM" or "the Company") filed an *Application for Waiver* ("Application") stating in part that compliance with the requirement of 20 CSR 4240-40.030(12)(P) requiring odorization of gas¹ for its pipeline transporting Renewable Natural Gas (RNG) from a facility at the Lemons East Landfill in Dexter, Missouri, to an interconnect with the Enbridge interstate pipeline² would be financially burdensome to the Company. MSM further stated that Enbridge requires that all gas injected into its interstate system be free of odorants,³ and that it is unaware of commercially available equipment for the removal

¹ Paragraph 4 of the Application states that compliance with Commission rule 20 CSR 4240-40.030 would impose a significant financial burden on Applicant, requiring installation of odorization equipment that cannot be utilized for gas ultimately delivered into the Enbridge interstate pipeline. While this sentence could be interpreted to refer to the Commission's Safety Standards – Transportation of Gas by Pipeline in total, Staff believes from other statements in the Application that MSM specifically means compliance with subpart (12)(P) of this rule, pertaining to odorization of gas. Staff has sent a data request to the Company to either confirm that this understanding is correct, or alternatively discover if the Company is seeking a waiver from any other provisions of 20 CSR 4240-40.030 in its Application.

² Paragraph 3 of the Application states that the pipeline extends from the Renewable Natural Gas ("RNG") facility at the Lemons East Landfill, located at 15250 Old Bloomfield Road, Dexter, Missouri 63841, and connects to the Enbridge Interconnect Station located on County Road 702, Dexter, Missouri.

³ Paragraph 8 of the Application states that gas to be injected into the interstate pipeline system is not permitted to be odorized.

of odorant from gas, and would thus have to design and construct equipment for the removal of odorant.⁴

On September 30, 2025, the Commission ordered that no later than November 14, 2025, Staff shall file either a recommendation regarding MSM's application or a status report indicating when it expects to file a recommendation.

As of the filing of this Status Report, Staff has performed the following:

1. Reviewed the Application and identified a potentially relevant federal pipeline safety rule: 49 CFR 192.625 – Odorization of Gas,⁵
2. Provided a copy of the Application to the Pipeline and Hazardous Materials Safety Administration (PHMSA) Office of Pipeline Safety (OPS) group email as recommended in Section 3.3.2 of the *Guidelines for States Participating in the Pipeline Safety Program*,⁶
3. Sent preliminary data requests to MSM regarding its pipeline, including requests for pipeline design information, class location studies, maps showing structures within the potential impact radius (PIR) of a pipeline rupture, construction details, copies of procedures required by Commission rules, and for documentation supporting the basis and need for a waiver from the odorization requirements in 20 CSR 4240-40.030(12)(P),

⁴ Paragraph 9 of the Application states that if Applicant is required to odorize the gas, it would also be required to remove the odorant prior to injection into the Enbridge pipeline, and that Applicant is unaware of any commercially available equipment for the removal of odorant from gas.

⁵ <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-D/part-192/subpart-L/section-192.625>.

⁶ <https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2024-06/2024-State-Guidelines-with-Appendices-2023-12-18.pdf>.

4. Met remotely with a representative of PHMSA to discuss PHMSA's questions and preliminary feedback on the Application, and sent additional data requests to MSM to address PHMSA questions,
5. Reviewed potentially applicable Enbridge Tariff provisions,⁷
6. Performed a search for commercially available technologies to remove mercaptans from gas,⁸ and
7. Received and reviewed MSM's responses to Staff's preliminary data requests, and sent follow-up data requests to MSM for clarification.

Following receipt of MSM responses to additional new and follow-up data requests due in December, 2025, Staff anticipates having a follow-up discussion with PHMSA prior to finalizing its recommendation. Staff further anticipates that due to upcoming holiday closures, additional time may be required to coordinate with other parties and requests that the Commission grant Staff until January 30, 2026, to provide either a recommendation regarding MSM's application or a status report indicating when it expects to file a recommendation.

⁷ Subject to verification by MSM response to an outstanding Staff data request, Staff believes that the Enbridge pipeline at location of the interconnect with MSM is identified as Texas Eastern Transmission, LP. The Federal Energy Regulatory Commission (FERC) tariff and gas quality information are available at: [Texas Eastern Transmission, LP - 007932908 - LINK Informational Postings](#)

⁸ Mercaptans, also known as thiols, are sulfur-containing compounds added to natural gas to provide odor.

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File No. GE-2026-0084

AFFIDAVIT OF CHRISTOPHER FITCH

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

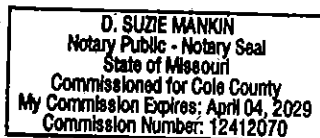
COMES NOW CHRISTOPHER FITCH and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Status Report*, in memorandum form; and that the same is true and correct according to his best knowledge and belief.

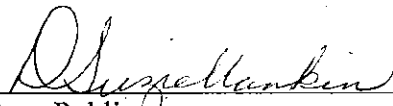
Further the Affiant sayeth not.


CHRISTOPHER FITCH

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 10th day of November 2025.




Notary Public

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Certain Provisions of 20 CSR 4240-40.030)

File No. GE-2026-0084

AFFIDAVIT OF GREG A. WILLIAMS

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

COMES NOW GREG A. WILLIAMS and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Status Report*, in memorandum form; and that the same is true and correct according to his best knowledge and belief.

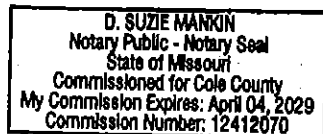
Further the Affiant sayeth not.

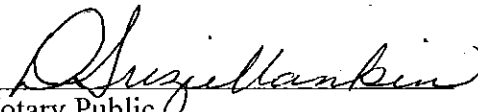


GREG A WILLIAMS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 10th day of November 2025.





Notary Public

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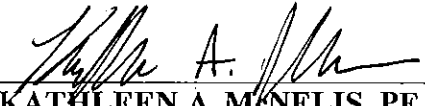
File No. GE-2026-0084

AFFIDAVIT OF KATHLEEN A. McNELIS, PE

STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

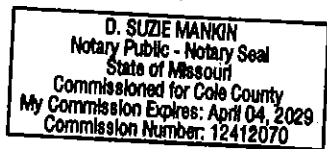
COMES NOW KATHLEEN A. McNELIS, PE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Status Report*, in memorandum form; and that the same is true and correct according to her best knowledge and belief.

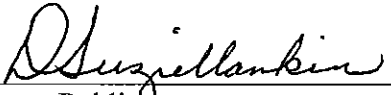
Further the Affiant sayeth not.


KATHLEEN A. McNELIS, PE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 12th day of November 2025.




Notary Public