

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

In the Matter of an Investigation into	)	
City Utilities of Springfield Plastic Pipe	)	
Failures and the Adequacy of its Leak	)	<b><u>Case No. GS-2004-0257</u></b>
Survey Procedures, Installation	)	
Procedures and Replacement Criteria	)	

**STAFF AND CITY UTILITIES OF SPRINGFIELD'S  
JOINT RECOMMENDATION FOR 2026 AND FORWARD**

**COMES NOW** the Staff of the Missouri Public Service Commission (hereinafter "Staff"), by and through counsel, and the City of Utilities of Springfield ("CU") files its *Joint Recommendation for 2026 and Forward*, and in support states as follows:

1. On May 18, 2010, Staff and CU filed a *Joint Recommendation Concerning Pipeline Replacement Schedule* ("Joint Recommendation"). The Joint Recommendation listed the parameters that Staff and CU agreed to follow for year 2010 and beyond. On May 28, 2010, the Commission issued an *Order Adopting Joint Recommendation and Ordering Compliance with Pipeline Replacement Schedule*.

2. In 2016, CU proposed to change its reporting period from a calendar year basis to an October through September annual reporting basis corresponding with CU's fiscal year to allow for more efficient scheduling of replacement projects. The Commission granted this change in the reporting period on May 31, 2016.

3. On February 3, 2022, the Commission ordered Staff to file a Status Report no later than March 31, 2022, and on March 31, 2022, Staff filed its Status Report with the Commission.

4. On March 18, 2024, the Commission ordered Staff to file a Status Report regarding the completion of the CU's plastic main and service line replacement program

and whether this case should be closed. The Commission Ordered Staff to file said report no later than April 18, 2024.

5. On April 18, 2024, Staff filed its ninth Status Report with the Commission, which provided a summary of CUs' progress from October 1, 2021 through September 2023. Staff indicated that it had not received the City's monthly updates for January 2024, February 2024, and March 2024. Moreover, Staff had not received CU's semi-annual reports for the periods of April 1, 2022, through September 30, 2022; October 1, 2022, through September 30, 2023; and October 1, 2023, through March 31, 2024. The parties agreed that CU would put the delinquent semi-annual reports covering the time periods of April 1, 2022 through September 30, 2023 into one report.

6. On April 29, 2024, the Commission ordered CU to provide Staff the combined report and monthly reports by May 17, 2024.

7. CU provided the combined reports and the monthly reports to Staff and Staff has reviewed the reports for consistency with the results provided by CU.

8. Attached hereto and incorporated herein by reference is *Staff's Recommendation Memorandum Regarding Modification of the Joint Recommendation Concerning Pipeline Replacement Schedule*.

9. Staff has monitored the progress of CU's pipeline replacement program since it began, approximately 20 years ago. The currently effective criteria are the twelve recommendations from the *Joint Recommendation Concerning Pipeline Replacement Schedule*, adopted by Commission order on May 28, 2010.

10. Due to two developments, Staff and CU are now recommending that the Commission modify its May 28, 2010, order to adopt a new *Joint Recommendation*

for 2026 and Forward, provided in Section 3.0 of this *Memorandum*. These developments are set forth in more detail in Staff's Recommendation Memorandum.

11. The Joint Recommendations for 2026 and Forward are as follows:

**Recommendation 1:** In the event CU discovers any additional pre-1985 "high-pressure"<sup>1</sup> DuPont Aldyl® "A" polyethylene piping (services lines 1¼ inches in diameter and larger and mains) in its gas distribution system, CU shall replace the pipe. If the pipe is still in service within six months of discovery, CU will notify Commission Staff of the extent of additional pre-1985 "high-pressure" DuPont Aldyl® "A" polyethylene piping (services lines 1¼ inches in diameter and larger and mains) discovered, and its plan for removal thereof. Commission Staff will file a copy of the notification in the case file for GS-2004-0257.

**Recommendation 2:** CU shall address the risk of the remaining Dupont Aldyl® "A" polyethylene piping in its DIMP, and take additional actions as needed to reduce or mitigate the risk.

**Recommendation 3:** CU shall conduct an annual leakage survey over its DuPont Aldyl® "A" polyethylene main segments that have exhibited splits or are confirmed to be in rock-dirt mix backfill. This will be implemented as an additional action in CU's DIMP.

**Recommendation 4:** CU shall conduct a leakage survey of Dupont Aldyl® "A" polyethylene piping in the downtown business district twice annually. This will be implemented as an additional action in CU's DIMP.

**Recommendation 5:** CU shall continue to complete Exposed Pipe Reports and inspect pipe for proper backfill. If a rock/dirt backfill is found, these segments of pipe shall

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<sup>1</sup> Pipe segments with Maximum Allowable Operating Pressure ("MAOP") of 60 psig.

be noted for annual leak surveys and systematic replacement. This will be implemented as an additional action in CU's DIMP.

**Recommendation 6:** CU will monitor performance measures from an established baseline for threats associated with its DuPont Aldyl® "A" polyethylene piping at least annually, and will provide a summary of the results to Staff. In the event that a baseline is exceeded, CU will additionally provide a summary of its evaluation of the effectiveness of its current actions to mitigate risks and propose alternative or additional actions.

**Recommendation 7:** CU shall notify the Commission if it makes substantive changes in its DIMP Plan that pertain to the above listed Recommendations, and shall explain the reason(s) for the changes.

12. Staff and CU recommend approval of the Joint Recommendation for 2026 and Forward.

13. There are no remaining issues that may require a procedural schedule and such matter can be closed upon an Order approving the Joint Recommendation for 2026 and Forward.

**WHEREFORE,** Staff and CU submit their Joint Recommendation for 2026 and Forward, and request the Commission approve said Joint Recommendation as set forth in paragraph 11 and the attached Staff Memorandum, close this case file, and any other relief as is just and reasonable under the circumstances.

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](mailto:scott.stacey@psc.mo.gov)

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

**/s/ Katherine A. Thompson**

Katherine A. Thompson  
Senior Legal/Regulatory Counsel  
Missouri Bar No. 65076  
City Utilities of Springfield  
301 E. Central St.  
Springfield, MO 65802  
417-831-8611  
[Katherine.Thompson@cityutilities.net](mailto:Katherine.Thompson@cityutilities.net)

**ATTORNEY FOR CITY UTILITIES  
OF SPRINGFIELD**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 5<sup>th</sup> day of March, 2026.

**/s/ J. Scott Stacey**

## MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File, GS-2004-0257,  
City Utilities of Springfield

**FROM:** Greg A. Williams, Associate Engineer, Safety Engineering Department  
Kathleen A. McNelis, P.E., Engineer Manager, Safety Engineering Department  
*/s/Kathleen A. McNelis 03/05/2026*  
Safety Engineering Department/ Date

**SUBJECT:** Staff Recommendations Regarding Modification of the *Joint Recommendation Concerning Pipeline Replacement Schedule*

**DATE:** March 05, 2026

### Executive Summary

Missouri Public Service Commission Staff (“Staff”) has monitored the progress of City Utilities of Springfield (“CU”)’s pipeline replacement program since it began, approximately twenty (20) years ago. The currently effective criteria are the twelve recommendations from the *Joint Recommendation Concerning Pipeline Replacement Schedule*, adopted by Commission order on May 28, 2010.

Due to two developments, Staff and CU are now recommending that the Commission modify its May 28, 2010, order to adopt a new *Joint Recommendation for 2026 and Forward*, provided in Section 3.0 of this *Memorandum*. These developments are as follows:

1. CU has completed Recommendation 1 of the *Joint Recommendation Concerning Pipeline Replacement Schedule*, adopted by Commission order on May 28, 2010. CU has replaced all known pre-1985 “high-pressure” Dupont Aldyl® “A” Polyethylene piping (service lines 1 1/4 inches in diameter and larger and mains), and
2. With respect to the remaining Dupont Aldyl® “A” Polyethylene piping, CU has identified in its Distribution Integrity Management Program (DIMP) threats with higher risk rankings. A copy of CU’s currently effective DIMP plan is attached as Confidential Appendix A to this *Memorandum*.

Staff has provided a summary of the current status of compliance with each of the 12 recommendations from the 2010 *Joint Recommendation Concerning Pipeline Replacement Schedule* in Section 2.0 of this *Memorandum*. In Section 3.0 of this *Memorandum*, Staff has listed Staff's and CU's joint recommendations for 2026 and forward.

## **1.0 Background Information**

On June 18, 2003, an incident occurred in Springfield, Missouri at the Ozark Empire Fairgrounds in which natural gas leaking from plastic pipe resulted in an explosion. An employee of the Ozark Empire Fair was fatally injured. The leak in the plastic pipe was the result of rock impingement on a type of plastic pipe, Dupont Aldyl® "A", that is known to be susceptible to brittle-like cracking failures.<sup>1</sup> There was an additional natural gas ignition involving the same type of plastic pipe and method of failure at 3050 North Kentwood, Springfield, Missouri, on July 10, 2003.<sup>2</sup>

As a result of these two incidents, Staff recommended and the Commission opened Case No. GS-2004-0257 to:

(1) identify the plastic mains and service pipes that may be susceptible to brittle-like cracking because of rock impingements,

(2) determine the criteria that should be used to identify plastic mains and service lines as potential risks for brittle-like failure due to rock impingement such as installation, operating and environmental conditions and piping failure characteristics,

(3) evaluate the effectiveness and the need to increase or expand the leak surveys over the identified plastic mains and service lines (example: the need for bar hole surveys over piping under continuous pavement),

(4) recommend replacement of plastic mains and service lines found in need of remedial action, and

(5) recommend and monitor completion of the replacement of all plastic service lines identified as having the potential for failure due to rock impingement or other factors.

Staff filed its first report of findings in Case No. GS-2004-0257 on June 16, 2004, recommending that the Commission order City Utilities of Springfield to implement a

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<sup>1</sup> Staff's Incident Report is filed in Case No. GS-2004-0040.

<sup>2</sup> The July 10, 2003 event is discussed in Staff's Incident Report filed in Case No. GS-2004-0040.

comprehensive plastic pipe replacement program. Replacement priorities were refined over time, resulting in the currently effective criteria in the *Joint Recommendation Concerning Pipeline Replacement Schedule*, that was adopted by the Commission on May 28, 2010.

## **2.0 Staff Analysis of Current Compliance Status for Each 2010 Recommendation**

### **Recommendations - Replacement Program Criteria for Calendar Year 2010 and Beyond:**

**2.1 2010 Recommendation 1:** City Utilities shall replace the remaining pre-1985 “high-pressure” DuPont Aldyl® “A” polyethylene piping (services lines 1¼ inches in diameter and larger and mains) at a rate of at least 6 miles annually.<sup>3</sup>

**Status:** According to CU’s records, this has been completed. With the completion of removal of pipe identified in Recommendation 1, this recommendation is only applicable to the extent that CU discovers additional pipelines that need to be replaced.

**Recommendation Going Forward:** In the event CU discovers any additional pre-1985 “high-pressure”<sup>4</sup> DuPont Aldyl® “A” polyethylene piping (services lines 1¼ inches in diameter and larger and mains) in its system, CU shall replace the pipe.

**2.2 2010 Recommendation 2:** City Utilities shall continue its practice of replacing nearby or adjacent pipe segments that are beyond the specific piping in the same work order number because the piping was installed in the same time period and could likely have been installed using the same methods and in the same environment.

**Status:** Following the completion of Recommendation 1, this recommendation is only applicable to the extent that CU discovers additional pipelines that need to be replaced. With respect to adjacent pipe installed in the same time period, CU completed a re-evaluation of its DIMP in August 2024. Staff completed an inspection of CU’s DIMP plan and implementation in November 2024. CU’s most recent DIMP plan addresses on-going monitoring of the risks associated with the Dupont Aldyl® “A” polyethylene piping, and as applicable additional actions to mitigate these risks.

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<sup>3</sup> The Commission Order Adopting Joint Recommendation and Ordering Compliance with Pipeline Replacement Schedule filed on May 28, 2010, Recommendation #5 of the REPLACEMENT PROGRAM CRITERIA FOR 2010 AND BEYOND requires that “Replacements of “high-pressure” DuPont Aldyl® “A” piping installed in 1985 and after, and other lower pressure categories of DuPont Aldyl® “A” piping is considered as a lower priority for replacement, but can be included in the total annual mileage if the segments have experienced leaks, are in a rock-dirt backfill, or if the piping is connected to a higher priority segment that is being replaced.”

<sup>4</sup> “High Pressure” refers to pipe segments with Maximum Allowable Operating Pressure (“MAOP”) of 60 psig.

**Recommendation Going Forward:** CU shall monitor the risk of the remaining Dupont Aldyl® “A” polyethylene piping in its DIMP, and take additional actions as needed to reduce or mitigate the risk.

**2.3 2010 Recommendation 3:** City Utilities shall continue its practice of replacing the service lines associated with the main replacements.

**Status:** With the completion of Recommendation 1, this recommendation is only applicable to the extent that CU discovers additional pipelines that need to be replaced.

**Recommendation Going Forward:** CU shall monitor the risk of the remaining Dupont Aldyl® “A” polyethylene piping in its DIMP, and take additional actions as needed to reduce or mitigate the risk.

**2.4 2010 Recommendation 4:** The replacements shall be prioritized based on risk factors, such as Maximum Allowable Operating Pressure (MAOP), date of installation, installation in rock-dirt backfill, history of leaks due to rock impingement, continuous pavement areas, areas of high population density, areas of previous leakage, and other appropriate criteria.

**Status:** With the completion of Recommendation 1, this recommendation is only applicable to the extent that CU identifies additional pipe that needs to be replaced.

**Recommendation Going Forward:** CU shall address the risk of the remaining Dupont Aldyl® “A” polyethylene piping in its DIMP, and take additional actions as needed to reduce or mitigate the risk.

**2.5 2010 Recommendation 5:** The primary focus of the replacement program shall be on “high-pressure” DuPont Aldyl® “A” piping that was manufactured before 1985 (pre-1985) that was installed in a rock-dirt backfill. Replacements of “high-pressure” DuPont Aldyl® “A” piping installed in 1985 and after, and other lower pressure categories of DuPont Aldyl® “A” piping would normally be a low priority, but can be included in the total annual mileage if the segments have experienced leaks, are in a rock-dirt backfill, or if the piping is connected to a higher priority segment that is being replaced.

**Status:** Following the completion of Recommendation 1, this recommendation as it pertains to inclusion of replacement mileage in the minimum 6 miles to be removed annually is no longer applicable. With respect to leaks on DuPont Aldyl® “A” piping installed in 1985 and after, and other lower pressure categories of DuPont Aldyl® “A” piping would normally be a low

priority, CU completed a re-evaluation of its DIMP in August 2024. Staff completed an inspection of CU’s DIMP plan and implementation in November 2024. CU’s most recent DIMP plan addresses on-going monitoring of the risks associated with the Dupont Aldyl® “A” polyethylene piping that remains in its system, and as applicable additional actions to mitigate these risks.

**Recommendation Going Forward:** CU shall address the risk of the remaining Dupont Aldyl® “A” polyethylene piping in its DIMP, and take additional actions as needed to reduce or mitigate the risk.

**2.6 2010 Recommendation 6:** If, at any time during the review of its Distribution Integrity Management Program (DIMP), City Utilities discovers more essential and higher priority areas on which it must concentrate its replacement efforts, such as rock impingement leaks on lower pressure PE piping and PE piping installed after 1984, City Utilities will bring these issues to Staff’s attention and notify the Commission.

**Status:** CU has included the threats associated with DuPont Aldyl® “A” piping installed in 1985 and after, and other lower pressure categories of DuPont Aldyl® “A” piping in its currently effective DIMP Plan (included as Appendix A to this *Memorandum*). The Commission’s DIMP rule<sup>5</sup> requires that operators determine the relative importance of each threat and estimate and rank the risks posted to its pipelines. CU’s *Natural Gas Distribution Integrity Management Plan for City Utilities of Springfield*, Sixth Revision (Appendix A to this *Memorandum*) provides a relative risk ranking of each of \*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<sup>5</sup> 20 CSR 4240-40.030(17) – Gas Distribution Pipeline Integrity Management (IM)

6 \*\* [REDACTED] \*\*

7 \*\* [REDACTED]

[REDACTED] \*\*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*

**Recommendation Going Forward:** CU shall address the risk of the remaining Dupont Aldyl® “A” polyethylene piping in its DIMP, and take additional actions as needed to reduce or mitigate the risk.

Recommendations – Non-Replacement Criteria for Calendar Year 2010 and Beyond:

**2.7 2010 Recommendation 7:** An annual leakage survey shall be conducted over pre-1985, 60 psig plastic piping. In addition, an annual leakage survey shall be conducted over post-1985<sup>8</sup> and/or low and medium<sup>9</sup> pressure main segments that have exhibited splits or confirmed to be in rock-dirt mix backfill.

**Status:** The replacement of pre-1985 Dupont Aldyl® “A” polyethylene piping operated at 60 psig has been removed, making part of this recommendation moot. However, post-1985 and/or low and medium pressure main segments remain. Because CU has \*\* [REDACTED] \*\*<sup>10</sup> Staff and CU agree that the annual leakage surveys over post-1985<sup>11</sup> and low and medium<sup>12</sup> pressure main segments that have exhibited splits or are confirmed to be in rock-dirt mix backfill should be continued.

**Recommendation Going Forward:** CU shall conduct an annual leakage survey over its Dupont Aldyl® “A” polyethylene main segments that have exhibited splits or are confirmed to be in rock-dirt mix backfill. This will be implemented as an additional action in CU’s DIMP.

**2.8 2010 Recommendation 8:** Quarterly leak surveys shall be conducted of the downtown business district.

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8 \*\* [REDACTED] \*\*

9 \*\* [REDACTED] \*\*

<sup>10</sup> See for example the Status of Recommendation 7 on page 8 of Staff’s Status Report filed April 18, 2024, in Case No. GS-2004-0257.

11 \*\* [REDACTED] \*\*

12 \*\* [REDACTED] \*\*

**Status:** Although CU has \*\* [REDACTED]

[REDACTED] \*\*<sup>13</sup> CU has proposed and Staff agrees that the frequency of leakage surveys in the downtown business district may be reduced to twice annually.

**Recommendation Going Forward:** CU shall conduct a leakage survey of the downtown business district twice annually. This will be implemented as an additional action in CU's DIMP.

**2.9 2010 Recommendation 9:** Any plastic piping that is exposed will be inspected for proper backfill, and if rock-dirt mix backfill is found, these main segments and larger diameter service lines (1¼-inch diameter and larger) shall be added to the Master List for annual leak surveys and systematic replacement.

**Status:** Because CU has \*\* [REDACTED]

[REDACTED] \*\*<sup>14</sup> Staff and CU agree that CU should continue to implement this recommendation.

**Recommendation Going Forward:** CU shall continue to complete Exposed Pipe Reports and inspect pipe for proper backfill. If a rock/dirt backfill is found, these segments of pipe shall be noted for annual leak surveys and systematic replacement. This will be implemented as an additional action in CU's DIMP.

**2.10 2010 Recommendation 10:** Semi-annual reports and monthly updates shall be submitted to Staff.

**Status:** CU has requested to eliminate this level of reporting due to the replacement of pre-1985 high pressure Aldyl A pipe in its system and by addressing monitoring in its most recent DIMP Plan. Staff agrees that this level of reporting is not necessary going forward for the following reasons:

- Staff completed a review of CU's currently effective DIMP Plan in November, 2024, and believes that this DIMP Plan (included as Confidential Appendix A to this *Memorandum*) currently includes adequate provisions to track and monitor the applicable data,
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<sup>13</sup> See for example the Status of Recommendation 8 on page 9 of Staff's Status Report filed April 18, 2024, in Case No. GS-2004-0257.

<sup>14</sup> See for example the Status of Recommendation 9 on pages 9-10 of Staff's Status Report filed April 18, 2024, in Case No. GS-2004-0257.

- Commission rules require that changes to required plans, procedures and programs be submitted to designated commission personnel within 20 days after a change is made,<sup>15</sup> and
- Staff performs routine inspections of CU's DIMP Plan and implementation.

**Recommendation Going Forward:** If the Commission adopts the new *Joint Recommendations for 2026 and Forward*, (included as Section 3.0 of this Memorandum), CU shall notify the Commission if it makes substantive changes in its DIMP Plan that pertain to the new *Joint Recommendations*, and shall explain the reason(s) for the changes.

**2.11 2010 Recommendation 11:** The mileage of pre-1985, 60 psig mains that remain in the distribution system shall be provided to Staff.

**Status:** CU has informed Staff that all of the pre-1985 60 psig mains have been removed from its system. Staff believes that CU has made a good faith effort to identify and remove all such pipe. However, given that the pipe in question was installed 40 or more years ago, there is a possibility that at some point in the future CU may discover previously unidentified segments within its system.

**Recommendation Going Forward:** In the event CU discovers any additional pre-1985 "high-pressure" DuPont Aldyl® "A" polyethylene piping (services lines 1¼ inches in diameter and larger and mains) remaining in its system, CU will schedule that segment for immediate replacement. If the pipe is not removed within six months of discovery, CU will notify the Commission Staff of the extent of additional pre-1985 "high-pressure" DuPont Aldyl® "A" polyethylene piping (services lines 1¼ inches in diameter and larger and mains) discovered, and its plan for removal thereof. Commission Staff will file a copy of the notification in the case file for GS-2004-0257.

**2.12 2010 Recommendation 12:** Staff and City Utilities shall continue to monitor the effectiveness of the Replacement Program. If at any time Staff determines that the program requirements should be enhanced, it will immediately bring its concerns and recommendations to the Commission.

**Status:** CU has proposed, and Staff agrees, that it is appropriate to address continued monitoring, evaluation and actions under CU's DIMP. Commission Rule 20 CSR 4240-

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<sup>15</sup> 20 CSR 4240-40.030(1)(J)1.

40.030(17)(D)5. requires that an operator develop and monitor performance measures from an established baseline to evaluate the effectiveness of its integrity management program. CU's currently effective DIMP Plan (included as Appendix A of this Memorandum). \*\* [REDACTED]

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**Recommendation Going Forward:** CU will monitor performance measures from an established baseline for threats associated with its DuPont Aldyl® "A" polyethylene piping at least annually, and will provide a summary of the results to Staff. In the event that a baseline is exceeded, CU will additionally provide a summary of its evaluation of the effectiveness of its current actions to mitigate risks and proposed alternative or additional actions.

### **3.0 Joint Recommendations for 2026 and Forward**

**Recommendation 1:** In the event CU discovers any additional pre-1985 "high-pressure"<sup>16</sup> DuPont Aldyl® "A" polyethylene piping (services lines 1¼ inches in diameter and larger and mains) in its gas distribution system, CU shall replace the pipe. If the pipe is still in service within six months of discovery, CU will notify Commission Staff of the extent of additional pre-1985 "high-pressure" DuPont Aldyl® "A" polyethylene piping (services lines 1¼ inches in diameter and larger and mains) discovered, and its plan for removal thereof. Commission Staff will file a copy of the notification in the case file for GS-2004-0257.

**Recommendation 2:** CU shall address the risk of the remaining Dupont Aldyl® "A" polyethylene piping in its DIMP, and take additional actions as needed to reduce or mitigate the risk.

**Recommendation 3:** CU shall conduct an annual leakage survey over its DuPont Aldyl® "A" polyethylene main segments that have exhibited splits or are confirmed to be in rock-dirt mix backfill. This will be implemented as an additional action in CU's DIMP.

**Recommendation 4:** CU shall conduct a leakage survey of Dupont Aldyl® "A" polyethylene piping in the downtown business district twice annually. This will be implemented as an additional action in CU's DIMP.

**Recommendation 5:** CU shall continue to complete Exposed Pipe Reports and inspect pipe for proper backfill. If a rock/dirt backfill is found, these segments of pipe shall be noted for

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<sup>16</sup> Pipe segments with Maximum Allowable Operating Pressure ("MAOP") of 60 psig.

annual leak surveys and systematic replacement. This will be implemented as an additional action in CU's DIMP.

**Recommendation 6:** CU will monitor performance measures from an established baseline for threats associated with its DuPont Aldyl® "A" polyethylene piping at least annually, and will provide a summary of the results to Staff. In the event that a baseline is exceeded, CU will additionally provide a summary of its evaluation of the effectiveness of its current actions to mitigate risks and propose alternative or additional actions.

**Recommendation 7:** CU shall notify the Commission if it makes substantive changes in its DIMP Plan that pertain to the above listed Recommendations, and shall explain the reason(s) for the changes.





**NATURAL GAS  
DISTRIBUTION INTEGRITY  
MANAGEMENT PLAN**

**IS DEEMED**

**CONFIDENTIAL**

**IN ITS**

**ENTIRETY**