

**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)	File No. AW-2021-0064
Amending the Commission's Rule on Electric)	
Gas, and Water Standards of Quality)	

AMEREN MISSOURI'S INITIAL COMMENTS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and responds to the Missouri Public Service Commission's ("Commission") *Order Opening a Working Case to Consider an Amendment of the Commission's Rule on Electric, Gas, and Water Utility Standards of Quality* effective September 16, 2020, which directs any stakeholder wishing to submit written comments regarding the rule amendment proposed by Staff or the cost to comply with that rule amendment to do so no later than November 2, 2020. Ameren Missouri hereby provides the following initial comments:

1. As a preliminary matter, Ameren Missouri appreciates the opportunity to provide these comments and otherwise participate in this docket.
2. Ameren Missouri generally supports the rule amendment proposed by Staff. Ameren Missouri agrees that alternative gas should be of pipeline quality and interchangeable with pipeline supply. Interchangeability analysis should be a prerequisite before alternative gas is accepted into a municipal or Local Distribution Company ("LDC") system.
3. However, Ameren Missouri recommends expanding the proposed rule to include periodic alternative gas testing and sampling requirements to ensure the alternative gas continues to meet pipeline quality standards. Alternative gas suppliers should be required to continuously verify key quality measures such as heat content and moisture content.

4. Furthermore, Ameren Missouri recommends the standards with minimum values have some time-dependent averages to avoid requiring immediate shut down for a single data point that does not meet the specifications. Ameren Missouri's experience with data sets using frequent time intervals often exhibit one-time errors or single data points out of compliance where the gas quality was acceptable over a longer (thirty-minute) interval. Automated control systems programmed with overly stringent criteria may cause an excess number of shutdowns that are problematic, not only for the alternative supplier, but to the system operator, without a justifiable quality issue. For example, under Subsection 2 of Staff's proposed amendments to 20 CSR 4240-10.030, the following time-dependent clarification could be helpful: "The minimum Btu cannot be less than 980 Btu/scf for any thirty-minute period or less than 950 Btu/scf for any time interval."

5. Ameren Missouri recommends that the Commission allow for LDCs and municipalities to set quality standards and constituent limits to maintain the integrity of their systems by further clarifying Subsection 10, paragraph D, as follows (deletions in strikethrough and additions italicized and bold):

(D) All alternative gas delivered into a natural gas distribution system shall be substantially free of impurities that may cause excessive fumes when burned in a properly designed and adjusted burner, *and substantially free from objectionable constituents and matter*; and each gas utility, including municipal systems, shall ~~ensure~~*limit* the quantity of impurities such as hydrogen sulfide, nitrogen, or other combustible or noncombustible, noxious, or toxic gas impurities *and objectionable constituents so that the gas delivered is* ~~are~~ within the limits recognized in good natural gas utility practice.

For example, bacteria and siloxane¹ limits may not be identified in interstate pipeline tariffs, but the municipality or LDC should have the ability to set reasonable limits in an interconnection agreement between parties.

6. Ameren Missouri recommends an additional deletion to Subsection 10 of Staff's proposed amendments to 20 CSR 4240-10.030 of the hydrogen sulfide testing requirement involving white filter paper, lead acetate and 5 cfh exposure to natural gas. Ameren Missouri primarily relies on its interstate pipeline providers for chemical analysis of their supply to ensure compliance with gas quality requirements.

Respectfully submitted,

/s/ Jermaine Grubbs

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¹ Siloxanes are silica-based compounds common in landfill gas.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on
this 2nd day of November, 2020.

/s/ *Jermaine Grubbs*
Jermaine Grubbs