



December 1, 2014

Docket No. PHMSA-2014-0092

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E.  
Room W12-140  
Washington, DC 20590

Ameren Missouri is a regulated electric and gas utility company based in St. Louis, Missouri. Our parent company is Ameren Corporation, also based in St. Louis, Missouri. The Ameren Missouri service territory spans 24,500 square miles. Every day, we serve more than 500 communities delivering safe, reliable energy to 1.2 million electric and 127,000 natural gas customers in north, central, east and southeast Missouri. Our gas delivery system includes about 54 miles of gas transmission pipelines, 3163 miles of distribution mains, and 136,000 natural gas services. Ameren Missouri values a positive safety culture among our employees, contractors and customers to ensure continued improvements in pipeline safety.

Ameren Missouri supports the efforts to improve pipeline safety through the modernization of the NPMS and is already proactively taking actions to enhance our mapping and pipeline data quality with multiple initiatives such as pipeline centerline surveys and records documentation management. However, Ameren Missouri recommends that changes to the data collection standards be developed through a joint government/industry/emergency responder/public committee to gain the insight from all stakeholders and develop a phased in approach that is cost effective and technically feasible.

The proposed changes that PHMSA has prescribed are not technically achievable with Ameren's current GIS systems. To improve the mapping accuracy and gather attribute data for transmission main segments will be a significant undertaking with the costs estimated to exceed \$7 million. It is important to recognize that operators have limited resources that are already stretched thin focusing on pipeline safety initiatives such as MAOP Verification, Integrity Verification Process and the replacement of aging infrastructure. Ameren recommends that PHMSA work with all stakeholders to develop a more reasonable approach that all can support in the modernization of the NPMS.

In closing, Ameren Missouri supports the comments submitted by the American Gas Association and appreciates this opportunity to comment on the proposed changes to NPMS. If you have any questions, please call me at (573) 876-3045.

Respectfully submitted,

By: Fred Luetkemeier