



December 8, 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 Illinois is a regulated electric and gas delivery company based in Collinsville, Illinois. Our parent company is Ameren Corporation located in St. Louis, Missouri. The Ameren Illinois service territory spans 43,700 square miles, or about three-quarters of the state. Every day we serve more than 1,200 communities, delivering safe and reliable energy to 1.2 million electric and 806,000 natural gas customers in central and southern Illinois. Our complex delivery system includes about 1,250 miles of gas transmission pipelines, 16,950 miles of distribution mains, and 12 underground natural gas storage fields. Ameren Illinois values a positive safety culture among our employees, contractors and customers to ensure continued improvements in pipeline safety.

Ameren Illinois 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, geographical mapping conflation, and records documentation management. However, Ameren Illinois 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 Illinois' current GIS systems. To improve the mapping accuracy and gather attribute data for over 10,000 transmission main segments will be a significant undertaking with the costs estimated to exceed \$15 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 Illinois 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 (217) 535-5089.

Respectfully submitted,

Dated; December 1, 2014

By: Jerome S. Themig