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**ILLINOIS COMMERCE COMMISSION**

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February 11, 2014

Mr. Ron Pate  
Vice President  
Ameren Illinois Utilities  
370 S. Main Street  
Decatur, Illinois 62523

Re: Notice of Probable Violation (NOPV # 2014-V001-00005)

Dear Mr. Pate:

A Representative of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a Record Audit for Ameren Illinois ("AIC") on January 28-30, 2014. During that audit, our Analyst observed the following probable violations with reference to Part 192 of the Federal Regulations for the transportation of Natural Gas. A Notice of Probable Violation ("NOPV") has been issued for the sections of the Code of Federal Regulations ("CFR") cited, and were discussed with Bob Roth and J.R. Jennings on January 30, 2014.

Below is the applicable section of the CFR and the subsection language applicable to the violation. In some instances, additional sections of the CFR are referenced to clarify the inadequacy identified. Following the CFR or subsection language is a description of each violation along with required corrective measures that must be taken to become compliant with the CFR.

**NOPV # 2014-V001-00005**

**CFR §192.605 Procedural manual for operations, maintenance, and emergencies** titled: **"192.605 Procedural manual for operations, maintenance, and emergencies"** states in paragraph (a), "General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted."

With reference to the requirements included in **CFR §192.736 Compressor stations: Gas detection**. Titled: **“192.736 Compressor stations: Gas detection.**” states in paragraph (c), “Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.”

Staff’s review of the Storage Field Fire/Gas Detector Alarm Inspection Form indicated that the operator did not complete the last quarter inspection per the operator’s 2013 O&M Manual.

Staff reviewed the operator's 2013 O&M manual to confirm the correct inspection period for the inspection of the fixed gas detection and alarm system. The operator's plan stated that a routine recalibration of the control module shall be completed quarterly.

Gas Storage Operating & Maintenance Plan  
Fire Detection and Gas Detection Systems  
Testing and Recording SFGD 2.01

### 3. Fire Detection and Alarm System Testing.

a. Routine recalibration of the control module shall be completed quarterly and shall be reported by the Operations Supervisor-Gas Storage on the Storage Field Fire/Gas Detector Alarm Inspection Form or electronic equivalent. See SFGD 4.

Ameren should include the Storage Field Operation and Maintenance Manual updates into the same review for storage personnel, as it conducts for the Distribution Operation and Maintenance Manual for distribution personnel when new updates are completed.

Upon receipt of the NOPV, Ameren Illinois Company may submit to this office within by March 13, 2014, in writing, evidence refuting the probable violation referenced in the NOPV. If evidence refuting the probable violation cannot be provided, you must submit a written plan of action outlining actions to be taken to correct the violation, including a schedule and the date when compliance is anticipated within 30 days from the date of this letter. The response should include the steps that Ameren has taken, or expects to take to prevent a recurrence of this situation.

Once the inadequacies identified herein have been addressed, documentation confirming the corrective action must be forwarded to this office. Staff will review the documentation provided to determine compliance.

Failure to respond to this letter by the date specified above and take corrective actions will subject Ameren to a penalty assessment as allowed under Section 7 of the Illinois Gas Pipeline Safety Act (220 ILCS 20/7).

Please be advised that pursuant to IL Adm. Code Part 596 of the Commission’s Rules, all information regarding this inspection in possession of the Commission, including communications regarding this inspection will be made available to the public

and posted on the Commission's website. Confidential and/or personal information including, but not limited to social security numbers, drivers license numbers, credit card numbers, debit card numbers, and medical records, etc. should be included in neither inspection documents nor correspondence with the Commission. Any person, as set forth in Section 596.20, who believes that any inspection information is confidential or proprietary shall request that the Commission enter an order to protect the confidential or proprietary information pursuant to 83 Ill. Adm. Code 200.430.

If you have any questions concerning this matter, please contact Charles Gribbins at (217) 414-9359, or I may be contacted at (217) 785-1165.

Sincerely,

A handwritten signature in black ink that reads "Darin R. Burk". The signature is written in a cursive style with a large initial "D" and "B".

Darin R. Burk  
Manager- Pipeline Safety

DRB/mn