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March 13, 2014

SENT VIA EMAIL

Mr. Darin Burk  
Manager, Gas Pipeline Safety  
Illinois Commerce Commission  
527 E. Capitol Avenue  
Springfield, Illinois 62701

Dear Darin:

This letter is in response to the Notice of Probable Violation (NOPV) issued on February 11, 2014, following an ICC record audit on January 28-30, 2014 at the Ameren Illinois (AIC) Lincoln Storage Field.

During the audit, Staff reviewed the records for the Fire and Gas Detection Alarm Inspection and observed that a quarterly inspection of the Gas Detection Alarm was not completed for the Lincoln Storage Field in the fourth quarter of 2013. The AIC Gas Operations and Maintenance Plan (O&M Plan) requires that a recalibration of the control module shall be completed quarterly. An NOPV (2014-V001-0005) was issued, for failing to follow O&M Procedures as required by CFR §192.605 (a), with reference to the requirements in CFR §192.736 to maintain the proper function of Gas Detection and Alarm systems at a compressor station.

Staff has requested that AIC submit evidence refuting the probable violation referenced in the NOPV or 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, and the steps that AIC has taken or expects to take to prevent a recurrence of this situation.

Staff also advised that AIC should include any Storage Field O&M Plan updates into a review for Storage personnel, when training is conducted on updates to the O&M Plan.

Since the completion of the audit, AIC reviewed the Fire and Gas Detection Alarm inspection records at the other AIC Gas Storage Fields and determined that there were no missing inspections for these locations in 2013. A quarterly inspection of the Gas Detection alarm equipment at the Lincoln Storage Field was successfully completed on January 30, 2014.

To prevent a reoccurrence of this situation, AIC has created tracking items in the Gas Compliance System (GCS) for the inspection of Fire and Gas Detection alarm equipment for each of the AIC Gas Storage Field locations. These tracking items in the GCS database will

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assist in the scheduling and oversight of the inspections to ensure they are completed as required. Additionally, AIC Gas Training has developed refresher training material on recent Storage Field O&M Plan changes to be reviewed by Gas Storage field personnel and will include these sections in O&M Plan reviews as future updates are completed.

Please contact me if you have any concerns or if you would like any additional information.

Sincerely,



John W. Bozarth  
Manager, Gas Compliance & Training

cc: RDPate  
SAGlaeser  
JKVoiles  
SRColyer  
SDUnderwood