



ILLINOIS COMMERCE COMMISSION

May 8, 2014

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

Re: Notice of Probable Violation's (NOPV #'s 2014-V001-00030 & 2014-V001-00031)

Dear Mr. Pate:

A representative of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a Record Audit for Ameren Illinois ("AIC") on April 29, 30, and May 1, 2014 (Inspection # 2014-P-00187). 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. Notice of Probable Violations ("NOPV") have been issued for the sections of the Code of Federal Regulations ("CFR") cited, and were discussed with Dallas Jett on May 1, 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-V001-00031

CFR § 192.491 titled: "**Corrosion control records**" states in paragraph (c), "Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years, except that records related to §§192.465(a) and (e) and 192.475(b) must be retained for as long as the pipeline remains in service.

With reference to the requirements included in **CFR § 192.465** titled: "**External corrosion control: Monitoring.**" states in paragraph (e), "After the initial evaluation required by §§ 192.455(b) and (c) and 192.457(b), each operator must, not less than every 3 years at intervals not exceeding 39 months, reevaluate its unprotected pipelines and cathodically protect them in accordance with this subpart in areas in which active

corrosion is found. The operator must determine the areas of active corrosion by electrical survey. However, on distribution lines and where an electrical survey is impractical on transmission lines, areas of active corrosion may be determined by other means that include review and analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipeline environment.”

Listed below is an instance detailing the failure to meet the requirements as stipulated under 192.465:

On April 30, 2014, Staff noted that Ameren Illinois did not maintain documentation of unprotected pipeline surveys. Survey number 1391 on June 28, 2013, was improperly labeled as unprotected due to an 8-inch bare steel pipeline. In fact the bare steel pipeline had been replaced with plastic in February 2010. Therefore, Ameren has not maintained documentation of the system’s unprotected bare steel in the pipeline system.

Ameren Illinois must update and maintain documentation and maps of all the unprotected bare pipeline in the system. Documented proof that the maps and documents have been updated and maintained must be provided to the Illinois Commerce Commission by August 1, 2014.

NOPV # 2014-V001-00030

CFR § 192.603 titled: “**General provisions**” states in paragraph (b), “Each operator shall keep records necessary to administer the procedures established under §192.605.

With reference to the requirements included in **CFR § 192.723** titled: “**Distribution systems: Leakage surveys**” states in paragraph (b), “The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements: (1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.”

Listed below is an instance detailing the failure to meet the requirements as stipulated under 192.723:

On April 29, 2014, Staff noted that Ameren Illinois did not perform a complete leakage survey in the Madison business district at a minimum of 1 per year not to exceed 15 months. Business district survey number 271 done on October 18, 2013, did not encompass a section of 2 inch steel on Bissell Avenue, due to a section missing on the survey map of page four. A complete leak survey was not done for the calendar year 2013. Therefore, a leakage survey in the Madison business district was not completed at a minimum of 1 per year and exceed 15 months.

A business district leak survey must be completed and documented for the missing section of the two inch steel on Bissell Avenue in Madison, IL. Documented proof of the leak survey must be provided to the Illinois Commerce Commission by August 1, 2014.

Upon receipt of the NOPV, Ameren Illinois may submit to this office by June 9, 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 AIC 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. Any correspondence must include the Inspection Report Number as well as the corresponding NOPV Number.

Failure to respond to this letter by the date specified above and take corrective actions will subject AIC 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 Valerie Schwing at (217) 414-9608, or I may be contacted at (217) 785-1165.

Sincerely,



Darin R. Burk
Manager- Pipeline Safety

DRB/mn