



ILLINOIS COMMERCE COMMISSION

October 31, 2014

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

Re: Notice of Amendment (NOA # 2014-A001-00117)

Dear Mr. Pate:

A representative of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a review of the Ameren Illinois ("AIC") Operation and Maintenance Manual ("O&M") on September 16-18, 2014 (Inspection # 2014-P-00426). The audit has established that AIC's O&M is inadequate.

Below is the applicable section of the Code of Federal Regulations ("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 inadequacy.

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CFR § 192.281 titled: "**Plastic pipe**" states in paragraph (c), "Heat-fusion joints. Each heat-fusion joint on plastic pipe must comply with the following: (3) an electro fusion joint must be joined utilizing the equipment and techniques of the fittings manufacturer or equipment and techniques shown, by testing joints to the requirements of §192.283(a) (1) (iii), to be at least equivalent to those of the fittings manufacturer.

On September 18, 2014, Staff noted two contrasting sticker dates on a Central Fusion box EF 108 serial #24834. One sticker was dated February, 2013, and the other sticker date documented that the prevented maintenance was due in July 2014. The Ameren Illinois Operations and Maintenance Manual does not give a definitive statement about when, how, or if the electro fusion boxes will be calibrated.

In order for this NOA to be closed the Ameren Illinois Operations and Maintenance Manual must state a processes for ensuring proper maintenance of the electro fusion boxes.

This letter serves as notice of inadequate procedure. A written response to this notice is requested by December 1, 2014. If you are contesting this Notice, include a detailed written explanation and any necessary supporting documents with your response.

If you are not contesting this Notice, the written response must acknowledge that amended procedures will be provided to this office by January 29, 2015. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed. Any correspondence must include the Inspection Report Number as well as the corresponding NOA Number.

Failure to respond to this Notice and take corrective action will result in the issuance of a Notice of Probable Violation and initiation of a Citation Order that will subject Ameren Illinois 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