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August 13, 2015

SENT VIA EMAIL

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

Dear Matt:

This letter is in response to the Notice of Probable Violations (NOPV 2015-V001-00004, 2015-V002-00004, 2015-V003-00004, and 2015-V004-00004) issued on July 14, 2015, following an ICC field audit (Inspection # 2015-P-00221) conducted on May 12 – 14, 2015 at the Ameren Illinois (AIC) Jerseyville Operating Center.

During the audit, Staff was informed by AIC that the gas services in Jerseyville at 309 Prairie, 311 Prairie, 319 Prairie, and 325 Prairie were recently discovered as isolated services. This information was obtained based on the knowledge of Jerseyville Gas Field Personnel and confirmed with details noted on the service record cards for these locations. As a result of these service lines being identified, AIC failed to inspect them once every ten years, or document these locations as an isolated service since their modification in September 1997 until April 2015. Staff determined that AIC did not demonstrate an understanding of its distribution system by reviewing the gas service record, a reasonably available document, as required by the AIC Distribution Integrity Management Plan (DIMP).

Staff noted that AIC must inspect all reasonably available information to properly populate the DIMP program and that once a review has been completed, then the findings must be forwarded to Staff. Staff requested to be notified by August 13, 2015 of the date this review is anticipated to be completed. In addition, 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.

The service locations referenced above were modified in 1997 to accommodate a sewer project that conflicted with these services at their existing depth. To remediate the sewer conflict, AIC installed a short section of plastic pipe within the existing steel service. To maintain the cathodic protection continuity, a bond wire was installed across these sections of plastic and connected to each end of the steel service which provided the continuity to

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protect the steel service sections from corrosion. This was an accepted practice to maintain cathodic protection and the service lines were considered a part of the cathodic protection structure.

AIC has similar installations where a bond wire is providing cathodic protection to isolated risers. In 2010, after discussions with Staff, AIC decided to define these installations as isolated services, instead of treating them as part of the cathodic protection structures, and began monitoring these riser locations every ten years in accordance with the pipeline safety requirements for isolated services. Prior to 2010, installations where a bond wire was providing cathodic protection for an isolated service riser was viewed as part of the cathodic protection structure and did not require individual monitoring or inspection.

While the pipe to soil voltage readings obtained in 2015 at the Prairie St locations indicated that the cathodic protection levels were adequate, AIC renewed the services at these four locations with new plastic services. This was completed by June 17, 2015. Since the time of the audit, AIC has also conducted refresher training and qualification with the Jerseyville Gas Field Personnel on properly identifying and documenting isolated steel sections.

Regarding the review of reasonably available documents, AIC has been engaged in an ongoing and multi-faceted effort to scan and analyze manual data from service record cards with the objective to make this information electronically available in the DIMP risk model as follows:

- In 2012, AIC employed 2 full time contractors and scanned 247,735 service records from legacy CIPS and legacy CILCO locations.
- In 2013, AIC employed 8 full time contractors and scanned 6,577 service cards from legacy CIPS and CILCO locations. In addition, 220,000 scanned service records were linked to the service location number, with data entry of the facility attributes of 145,000 service card records into the Company's database.
- In 2014, AIC employed 6 full time and 2 part time contractors and entered facility attributes of 198,698 scanned service cards and loaded 301,887 scanned service card images into AIC's Gas Compliance Asset Management (GCAM) database. Most of the service segments for legacy IP and legacy CILCO locations were loaded into the GCAM database by November 2014.
- In 2015 to date, AIC has employed 6 full time and 10 part time contractors and continues to scan and review records to be loaded into the GCAM database.

By 9/15/2015, it is projected that the following actions will be completed:

- All identifiable legacy CIPS service records will be loaded into the GCAM database.
- Missing attributes of legacy CILCO/IP records will be loaded into the GCAM database.

By 12/31/2015, it is projected that the following actions will be completed:

- 40% of legacy IP service cards will be scanned
- 10% of legacy IP service cards will be tied to GTech records
- 100% of legacy CILCO main records will be scanned
- 100% of legacy CILCO main records will be tied to to GTech records

- 25% of legacy CIPS main records will be scanned
- 10% of legacy CIPS main records will be tied to GTech records

AIC will provide periodic updates, on a schedule agreeable to Staff, regarding AIC's ongoing efforts to convert the manual data into an electronic format to enable incorporation into the DIMP risk analysis.

Please feel free to contact me if you have any questions.

Sincerely,

Handwritten signature of John W. Bozarth in black ink, including the initials M.F. at the end.

John W. Bozarth  
Manager, Gas Compliance & Training

JWB/mf

cc: RDPate  
SAGlaeser  
SRColyer  
BASheriff