



January 6, 2016

SENT VIA EMAIL

Mr. Matt Smith
Interim 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 Amendment (NOA) issued on October 8, 2015, following an ICC Staff review (Inspection # 2015-P-00345) of a gas outage that occurred at Ameren Illinois (AIC) in Chatham, Illinois on June 15, 2015.

As a result of the review of the actions that led up to the outage, Staff issued NOA # 2015-A001-00087 requesting AIC to update the Gas Operations & Maintenance (O&M) Plan to include procedures for monitoring system pressure while conducting squeeze off or cut off activities, and for coordinating with Gas Engineering prior to conducting squeeze off or cut off activities on a project where multiple cut offs are required. In addition Staff requested AIC to perform a cause analysis of the actions leading up to and including the cut off that resulted in the outage and to review the associated procedures that are currently in affect.

AIC previously responded on November 6, 2015 indicating that amended procedures would be provided to Staff by January 6, 2016.

In response to this Notice of Amendment, AIC will make revisions to the Gas O&M Plan Procedures as follows:

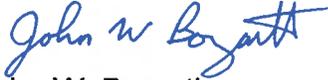
1. Polyethylene Pipe, Squeeze Off (Section POLY 2.02, subsection 1. General) – Additional language will be added to state:
 “When squeezing a line that has two or more feeds into the area, a pressure gauge should be installed on the live side of the squeeze and monitored throughout the stopping operations. See PRES 2.03 Potential Over Pressurization of Service Interruption.”

- A. Pressure Monitoring, Potential Over Pressurization or Service Interruption (Section PRES 2.03, subsection 4. Activities Requiring an Operational Checklist) – Additional language will be added to state:
 “When multiple tie-ins / cut-offs are required for system maintenance or replacement, Gas Engineering shall develop a written sequence of operations

to ensure actions taken will not adversely affect system supply. Gas Engineering should review the construction sequence with the Gas Supervisor and the Construction Inspector where applicable. If the scope of field work changes, the plan should be modified and approved by Gas Engineering.”

AIC also completed a review of the factors that contributed to this outage and is providing Staff with a copy of the findings of this analysis.

Sincerely,



John W. Bozarth
Manager, Gas Compliance & Training

cc: RDPate
SAGlaeser
SRColyer
BASheriff

