STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

December 10, 2015

Mr. Ron Pate
Vice President of Operations and Technical Services
Ameren Illinois Company
370 S. Main Street
Decatur, IL 62523

Re: Notice of Probable Violation's (NOPV #'s 2015-V001-00027 through 2015-V006-00027)

Dear Mr. Pate:

A representative of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a record and field audit for the Ameren Illinois Company ("Ameren") at the Macomb Operating Center on October 20-22, 2015 (Inspection # 2015-P-00374). 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. A Notice of Probable Violation ("NOPV") has been issued for the sections of the Code of Federal Regulations ("CFR") cited, and discussed with Chris Juliusson on October 22, 2015.

Below is the applicable section of the CFR and the subsection language applicable to the violation. 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.

CFR §192.491 titled: ***"Corrosion Control Records"*** states in paragraph (a), "Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system. Records or maps showing a stated number of anodes, installed in a stated manner or spacing, need not show specific distances to each buried anode."

Listed below are 6 instances detailing the failure to meet the requirements as stipulated under 192.491(a):

NOPV # 2015-V003-00027

It was discovered during the field audit that 323 East Jefferson Street is no longer an isolated service. Records were not updated when the service was replaced in 2013.

Ameren must update cathodic protection maps and records when an isolated service is replaced within 90 days as stipulated in the O&M.

NOPV # 2015-V005-00027

It was discovered during the field audit that 603 S. Lafayette Street is no longer an isolated service. Records were not updated when the service was replaced in 2013.

Ameren must update cathodic protection maps and records when an isolated service is replaced within 90 days as stipulated in the O&M.

NOPV # 2015-V001-00027

It was discovered during the field audit that 700 West Jefferson Street is no longer an isolated service. Records were not updated when the service was replaced in 2013.

Ameren must update cathodic protection maps and records when an isolated service is replaced within 90 days as stipulated in the O&M.

NOPV # 2015-V002-00027

It was discovered during the field audit that 715 West Jefferson Street is no longer an isolated service. Records were not updated when the service was replaced in 2013.

Ameren must update cathodic protection maps and records when an isolated service is replaced within 90 days as stipulated in the O&M.

NOPV # 2015-V004-00027

It was discovered during the field audit that 725 West Jefferson Street is no longer an isolated service. Records were not updated when the service was replaced in 2013.

Ameren must update cathodic protection maps and records when an isolated service is replaced within 90 days as stipulated in the O&M.

It was discovered during the field audit that 729 West Jefferson Street is no longer an isolated service. Records were not updated when the service was replaced in 2013.

Ameren must update cathodic protection maps and records when an isolated service is replaced within 90 days as stipulated in the O&M.

Upon receipt of the NOPV, Ameren Illinois Company may submit to this office by January 11, 2016, 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 by January 11, 2016. The response should include the steps that Ameren 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 Ameren 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 Kevin Hecker at 217-414-9356, or I may be contacted at (217) 785-1165.

Sincerely,

Matthew T. Smith/mn

Matthew T. Smith
Interim Program Manager - Pipeline Safety

MTS/mn