Ameren
ILLINOIS

January 11, 2016

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 Notices of Probable Violation (NOPVs 2015-V001-00027, through 2015-V006-00027) issued on December 10, 2015, following an ICC record and field audit (Inspection # 2015-P-00374) conducted on October 20-22, 2015 at the Ameren Illinois (AIC) Macomb Operating Center.

During the field audit, Staff discovered six locations where cathodically isolated gas services had been replaced in 2013, and the associated monitoring records were not updated. Staff issued six instances of NOPV 2015-V-00027 for these locations and noted that AIC must update cathodic protection maps and records when an isolated service is replaced within 90 days as stipulated in the AIC O&M Plan. Staff has requested that AIC submit evidence refuting the probable violation referenced in the NOPVs 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.

Since the replacement of these six isolated services in 2013, AIC replaced its legacy Gas Compliance System (GCS) which was used to manage gas compliance records including isolated service monitoring test point locations. In November 2014, AIC replaced GCS with Maximo as its Gas Compliance Work Management system. Maximo provides AIC with an enhanced platform to validate work performed in the field and to modify work processes when needed. To prevent a reoccurrence of this situation, AIC is designing work functionality in Maximo which will create a service request whenever a gas service is modified or replaced in the field. These service requests will be resolved by Corrosion Control who will review the completed work for any impact to the cathodic protection systems, including requirements for maintaining any test points related to isolated services. This process functionality is planned to be in production by April 2016 and will help ensure that isolated services are maintained in a timely fashion in Maximo once construction work is completed.

Since the completion of Staff's audit in Macomb, AIC has reviewed the six test points identified in the NOPV, and has retired these six isolated service monitoring test points from the Maximo database.

In addition to these corrections, AIC has identified approximately 12,000 isolated service monitoring test points that could contain locations where isolated services have been replaced or retired. To ensure that these active test point monitoring records do not include locations where isolated services have been replaced or retired, AIC will perform a records and/or field review of these additional locations and maintain these records accordingly in Maximo. AIC will provide Staff with a summary of any such locations where isolated services had been previously retired. AIC expects to be complete the field review of these locations by the end of 2017.

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

Sincerely,

John W. Bozarth

John W. Bozarth
Manager, Gas Compliance & Training

cc: RDPate
SAGlaeser
SRColyer
BASheriff