Ameren ILLINOIS

January 15, 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 Probable Violation (NOPV 2015-V001-00028) issued on December 16, 2015, following Staff's Compliance Follow-Up audit (Inspection # 2015-P-00392) of Ameren Illinois (AIC) at the Pawnee Gas Training Center on October 27-29, 2015.

During Staff's Compliance Follow-up audit of Notice of Amendment (NOA) #2013-A001-00230,Staff noted that AIC's NOA response on January 9, 2014 indicated that new language would be included in the next update release of the AIC Gas O&M Plan in 2014 stating the following:

> "Upon completion of gas projects, updates to AIC's electronic mapping system in G/Tech will be completed within a 90 day period from the time the completed job packet is approved".

Staff noted that this language had not yet been incorporated into the O&M plan and converted the Notice of Amendment (2013-A001-00230) to a Notice of Probable Violation (NOPV 2015-V001-00028) for failing to meet the deadline stated in AIC's response to this NOA.

During the Follow-Up audit in October 2015, AIC indicated to Staff that the revisions were scheduled to be included with the January 2016 update to the AIC Gas O&M Plan in section MAIN 1 – Gas Main Requirements. AIC released a revision to the Gas O&M Plan in December 2014, however the scope of this release was limited to changes specific to the implementation of AIC's Maximo and Click Mobile Gas Compliance Work Management System. A subsequent release of revisions to the AIC Gas O&M Plan was issued in January 2016, including the language in MAIN 1 to address NOA # 2013-A001-00230.

To prevent a reoccurrence of this situation, AIC will review the Gas O&M Plan in section QUAL 1 – Quality Assurance Requirements, for new corrective action procedures on

communication and implementation of revised procedures related to any future NOA's that are received from Staff. This review will be completed in 2016 as a part of the Gas O&M Plan review process.

Please feel free to contact me if you have any concerns or if you would like any additional information regarding this issue.

Sincerely,

John W. Bozarth

John W. Bozarth
Manager, Gas Compliance & Training

cc: RDPate
SAGlaeser
SRColyer
BASheriff