



ILLINOIS COMMERCE COMMISSION

December 16, 2015

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

Re: Notice of Probable Violation (NOPV # 2014-V002-00030)

Dear Mr. Pate:

Representatives of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a Record audit for Ameren Illinois ("Ameren") on November 10, 12, and 13, 2015 (Inspection # 2015-P-00393). During that audit, our Analysts observed the following probable violation 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 section of the Code of Federal Regulations ("CFR") cited, and was discussed with Chris Juliusson on November 13, 2015.

Below is the applicable section of the CFR and the subsection language applicable to the violation. In some instances, additional sections of the CFR are referenced to clarify the inadequacy identified. 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.

NOPV # 2014-V002-00030

CFR §192.603 titled: "General provisions" states in paragraph (b), "Each operator shall keep records necessary to administer the procedures established under §192.605."

With reference to the requirements included in **CFR §192.723** titled: "**Distribution systems: Leakage surveys**" states in paragraph (b) (1), "The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements: A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer,

and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.”

Due to a scale change in the business district maps utilized in 2014 for Jacksonville, Illinois, there were two segments of main and service lines that were indicated and surveyed in 2013 that were not included on the 2014 maps utilized to conduct the business district leak surveys, thus were not surveyed in 2014. The first location was at Chambers Street and S. Diamond, and the second was a segment of main and one service line on Stevenson Drive north of Morton Avenue. Further review of these segments observed that they were included and leak surveyed during the 2015 Business District Survey.

Ameren shall explain in the response how this will be prevented from occurring in the future.

Upon receipt of the NOPV, Ameren Illinois may submit to this office by January 15, 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 15, 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 Jim Watts at (217) 414-9609, or I may be contacted at (217) 785-1165.

Sincerely,

A handwritten signature in black ink that reads "Matthew T. Smith /mn". The signature is written in a cursive style.

Matthew T. Smith
Interim Program Manager- Pipeline Safety

MTS/mn