



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 2014-V002-0030) issued on December 16, 2015, following an ICC Record audit (Inspection # 2015-P-00393) conducted on November 10 and 12-13, 2015, at the Ameren Illinois (AIC) Jacksonville Operating Center.

As a part of the Records audit, Staff reviewed documentation for leak surveys completed in 2013 and 2014, and noted that there were two gas main segments and two gas service lines in Jacksonville on Business District Leak Survey #1816 that were completed in 2013, but were not included on the corresponding 2014 Leak Survey maps. Staff issued NOPV # 2014-V002-00030 with reference to CFR §192.723 which requires leak surveys conducted in a business district to be completed once each calendar year, not to exceed 15 months. Staff requested that AIC submit evidence refuting the probable violation or if evidence cannot be provided, a written plan outlining action to be taken to correct the violation including a schedule and the date when compliance is anticipated and steps that AIC has taken or expects to take to prevent a recurrence by January 15, 2016.

AIC determined that the 2014 Business District Leak Survey maps for Survey #1816 were printed at a different scale than the maps used in 2013. This resulted in these missing main and service segments not being printed on the 2014 maps. Therefore, there was no conclusive data indicating that these segments were leak surveyed in 2014 as required.

Upon discovery, Staff reviewed the records for Leak Survey #1816 for 2015 to determine if these segments were documented as leak surveyed. Staff observed that these segments were documented as completed during the 2015 Business District Leak Survey for this location.

To prevent a recurrence of this situation, AIC no longer uses paper maps to conduct leak survey which eliminates the scaling issue associated with printed maps. All leak survey documentation, beginning with work completed in 2015, is documented electronically through

AIC's Maximo and Click Mobile gas compliance asset management system, which was implemented in November of 2014. The completion of a leak survey now requires all gas facilities associated to the survey to have a completion status in Click Mobile prior to completing the leak survey work order in the field. This will help to ensure that all gas facilities are leak surveyed or removed from service prior to the completion of the corresponding leak survey work order. This quality control measure is an enhancement over the previous paper leak survey map process.

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

Sincerely,

A handwritten signature in blue ink that reads "John W. Bozarth". The signature is written in a cursive style with a large initial 'J'.

John W. Bozarth
Manager, Gas Compliance & Training

cc: RDPate
CGilson
CWCloninger
SAGlaeser
SRColyer
BASheriff

