



ILLINOIS COMMERCE COMMISSION

January 26, 2016

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 (NOPV #'s 2015-V001-00035 & 2015-V002-00035)

Dear Mr. Pate:

Representatives of the Illinois Commerce Commission Pipeline Safety Program ("Staff") conducted a Record Audit for the Ameren Illinois Company ("Ameren") at the Mattoon Operating Center on December 15, 17 & 18, 2015 (Inspection # 2015-P-00423). During that audit, our Analysts 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 were discussed with Kevin Glaspy on December 18, 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 §192.321 titled: ***"Installation of plastic pipe."*** states in paragraph (a), "Plastic pipe must be installed below ground level except as provided by paragraphs (g) and (h) of this section."

Listed below are 2 instances detailing the failure to meet the requirements as stipulated under 192.321 (a):

NOPV # 2015-V001-00035

Staff completed a review of patrolling records that indicated plastic main was installed in an above grade casing at the end of a box culvert at 11th Street and Van Buren Street. Staff conducted a field inspection to verify the location and placement of the plastic main. Staff advised the operator that the plastic main cannot come above

ground, even in a casing, unless it is attached to the underside of a bridge and is protected from heat and cold variations.

Ameren must relocate the plastic main below ground to meet the requirements of this section.

NOPV # 2015-V002-00035

Staff completed a review of patrolling records that indicated plastic main was installed in an above grade casing at the end of a box culvert at 12th Street and Van Buren Street. Staff conducted a field inspection to verify the location and placement of the plastic main. Staff advised the operator that the plastic main cannot come above ground, even in a casing, unless it is attached to the underside of a bridge and is protected from heat and cold variations.

Ameren must relocate the plastic main below ground to meet the requirements of this section.

Ameren must review all potential locations and documents associated with those pipelines, similar to the locations stated above, to determine if any locations exist where a plastic main has been inserted through a steel casing above ground. Ameren must respond to the Illinois Commerce Commission by February 25, 2016, with a detailed plan when the review will be completed and a date the locations detected, if any, will be modified to be in compliance with CFR §192.321 (a).

Upon receipt of the NOPV, Ameren Illinois Company may submit to this office by February 25, 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 February 25, 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 Charles Gribbins at (217) 414-9359, or I may be contacted at (217) 720-0291.

Sincerely,

A handwritten signature in black ink that reads "Matthew T. Smith" followed by a stylized monogram "mn".

Matthew T. Smith
Interim Program Manager- Pipeline Safety

MTS/mn