

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company)
d/b/a Ameren Missouri Concerning a Natural)
Gas Incident at 3404 Georgia Street in)
Louisiana, Missouri)

File No. GS-2016-_____

**STAFF’S MOTION TO ESTABLISH A CASE FOR
INVESTIGATION OF A GAS SAFETY INCIDENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission to establish a case for investigation of a gas safety incident, as follows:

1. The Missouri Public Service Commission has statutory responsibility to assure the health and safety of employees, customers, and the public served by natural gas corporations under Section 386.310 RSMo.

2. The cited section authorizes the Commission, after hearing or complaint, to order a utility to take appropriate steps to promote the safety of its employees, customers, and the general public.

3. Union Electric Company d/b/a Ameren Missouri is a “gas corporation” as defined in Section 386.020(18) RSMo and therefore subject to the jurisdiction of the Commission.

4. A reportable incident occurred on Friday, November 27, 2015, in Louisiana, Missouri, an area served by Ameren Missouri. No injuries were reported and significant property damage occurred.

5. Staff’s initial investigation indicates that natural gas was released from a natural gas service line. The escaping natural gas was ignited outside of a restaurant at

3404 Georgia Street in Louisiana, Missouri, at approximately 2:50 PM. The natural gas fire spread to the inside of the restaurant and the building was destroyed.

6. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Unit.

7. Staff further recommends that the Commission direct that the report, or a status report, be filed within 180 days of the date on which the case is established.

WHEREFORE, Staff respectfully requests that the Commission establish a case for the purpose of receiving a report, or status report, as described herein.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 21st day of December, 2015.

/s/ Jeffrey A. Keevil