BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company)	
Concerning a Natural Gas Incident at) <u>File N</u>	o. GS-2014-
2222 Menard Street in St. Louis,)	
Missouri)	

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. Laclede Gas Company ("Laclede") of St. Louis, 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 Wednesday, February 5, 2014, in St. Louis, Missouri, an area served by Laclede. Minor injuries to one person were reported, and significant property damage occurred.
- 5. Staff's initial investigation indicates that natural gas was released from a natural gas service line damaged by a contractor. Natural gas migrated into a three-

story brick structure, a business, at 2222 Menard Street in St. Louis. An explosion and subsequent fire occurred shortly after 1 p.m.

- 6. As a result of this incident, Staff recommends the Commission establish a case for purpose of receiving the Gas Incident Report resulting from the investigation of the incident by the Commission's Gas Safety/Engineering Section.
- 7. Staff further recommends that the Commission direct that the Gas Incident 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 Gas Incident Report or status reports as described herein.

Respectfully submitted,

STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

/s/ John D. Borgmeyer

John D. Borgmeyer
Deputy Legal Counsel
Missouri Bar No. 61992
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
Telephone: (573) 751-5472

Fax: (573) 751-9285

Email: john.borgmeyer@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 14th day of February, 2014.

/s/ John D. Borgmeyer