

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

In the Matter of the Establishment of a Working Case)
for the Review and Consideration of Amending) **File No. GW-2023-0272**
the Commission’s Natural Gas Safety Rules)

STAFF RESPONSE TO MOTION FOR ADDITIONAL TIME

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its *Staff Response to Motion for Additional Time* states as follows:

1. On February 27, 2023, Staff requested the Commission open a working docket for the purpose of updating the Commission’s gas safety rules to reflect recent U.S. Department of Transportation rule changes, address stakeholder comments deferred from a previous working docket, GW-2022-0237, and reflect certain clarifications and editorial revisions.

2. Staff’s request included Attachments with rule amendment proposals:

- i. Attachment A, proposal to adopt certain Federal Rule amendments
- ii. Attachment B, proposal to correct, clarify and update certain provisions of 20 CSR 4240-40.020
- iii. Attachment C, proposal to correct, clarify and update certain provisions of 20 CSR 4240-40.030

3. The Commission granted Staff’s request, opening a working case on March 8, 2023, and invited stakeholders who wished to comment on these rule amendment proposals to do so no later than April 3, 2023.

4. A few stakeholders filed comments on April 3, 2023, and Spire Missouri filed a motion requesting an additional thirty (30) days to file its comments on Staff's proposed rule amendments.

5. As Staff noted in its request to open this working case, Federal law requires the State of Missouri to take measures to adopt each applicable federal pipeline safety standard within a prescribed period of time.¹ Staff does not want to further delay the process of moving forward with the adoption of applicable federal pipeline safety standards in Attachment A. Therefore, **Staff proposes to move forward at this time with only the rule amendment proposals in Attachment A** and the proposals in Attachments B and C will be further considered in a subsequent rulemaking.

6. Staff would suggest that stakeholders focus their efforts on reviewing and providing comments, if any, on the rule amendment proposals in Attachment A. Should Staff recommend moving to a formal rulemaking case in less than thirty (30) days, stakeholders would still have the opportunity to comment in the formal rulemaking.

WHEREFORE, Staff respectfully submits its *Staff Response to Motion for Additional Time* for the Commission's information and consideration.

¹ 49 U.S. Code § 60105 requires, among other things, that the state authority adopt each applicable federal pipeline safety standard by the date of its annual certification, or in the event a standard was established within 120 days before the date of the certification, be taking steps to adopt that standard.

Respectfully submitted,

/s/ Jamie S. Myers

Jamie S. Myers

Deputy Counsel

Mo. Bar No. 68291

200 Madison St, Ste. 800

P.O. Box 360

Jefferson City, MO 65102

Phone: 573-526-6036

Fax: 573-751-9285

E-mail: jamie.myers@psc.mo.gov

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 as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 7th day of April, 2023.

/s/ Jamie S. Myers