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

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In the Matter of the Establishment of a Working Case for the Review and Consideration of Amending the Commission's Natural Gas Safety Rules

Case No. GW-2023-0272

## **MOTION FOR ADDITIONAL TIME TO RESPOND**

Spire Missouri Inc. ("Spire Missouri") respectfully submits this *Motion for Additional Time to Respond*, requesting an extension of 30 days to file comments on amendments to gas safety rules proposed by the Staff of the Missouri Public Service Commission, stating the following:

1. On February 27, 2023, the Staff of the Missouri Public Service Commission ("Staff") filed its *Staff Motion to Establish Working Case*, requesting that the Missouri Public Service Commission ("Commission") open a working docket for the purpose of updating the gas safety rules to reflect recent United States Department of Transportation rule changes and certain clarification and editorial revisions. Staff's proposed rule amendments were attached to its Motion.

2. On March 8, 2023, the Commission issued an Order establishing the working docket requested by Staff. The Commission set a deadline of April 3, 2023 for stakeholders to file comments on Staff's proposed rule amendments.

3. After discussions among the Missouri gas utility operators, Spire Missouri requires additional time to review and further develop its comments on the rule amendments proposed by Staff. Spire Missouri is requesting an additional thirty (30) days, until May 3, 2023, to file its comments on Staff's proposed rule amendments.

**WHEREFORE**, Spire Missouri requests an additional thirty (30) days, until May 3, 2023, to file its comments on Staff's proposed rule amendments to the gas safety rules.

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Respectfully submitted,

/s/ J. Antonio Arias

Matthew Aplington MoBar #58565 General Counsel Spire Missouri Inc. 700 Market Street, 6<sup>th</sup> Floor St. Louis, MO 63101 (314) 342-0785 (Office) Email: matt.aplington@spireenergy.com

J. Antonio Arias, MoBar #74475 Counsel, Regulatory Spire Missouri Inc. 700 Market Street, 6<sup>th</sup> Floor St. Louis, MO 63101 (314) 342-0655 (Office) Email: antonio.arias@spireenergy.com

## ATTORNEYS FOR SPIRE MISSOURI INC.

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by

electronic mail to all counsel of record on this 3<sup>rd</sup> day of April, 2023.

/s/ Lew Keathley

Lew Keathley