

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

In the Matter of the Request of Spire Missouri Inc.     )  
for a Temporary Waiver from Commission Rules     )     **File No. GE-2020-0373**  
20 CSR 4240-40.030 (9)(Q), (13)(M), (15)(C),     )  
(15)(D) and (15)(E) and Orders Pertaining to     )  
Inspections and Replacements     )

**SPIRE MISSOURI INC’S RESPONSE TO STAFF RECOMMENDATION**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), on behalf of its operating units, Spire Missouri East (“Spire East”) and Spire Missouri West (“Spire West”) and files this Response to the Staff of the Missouri Public Service Commission’s (“Staff”) May 26, 2020 *Staff Recommendation* (“Recommendation”). In response to the Recommendation, Spire Missouri respectfully states as follows:

1. On May 26, 2020, the Staff filed its Recommendation to Spire Missouri’s request for temporary waiver from certain rules and Commission orders relating to inspections and leak surveys that the Company found difficult if not impossible to conduct in a timely manner given safety restrictions related to the COVID-19 pandemic.

2. The Staff recommended approval of some of Spire Missouri’s waiver requests, as well as denial of some of the Company’s waiver requests. The Recommendation also included a series of conditions, and requests for additional information and further clarification from the Company.

3. Staff has recommended approval of Spire Missouri’s waiver requests pertaining to Rules 20 CSR 4240-40.030(9)(Q)1 (Atmospheric Corrosion Control Monitoring of Inside Meter Sets), 20 CSR 4240-40.030(13)(M)1,(13)(M)2.A and B

(Distribution Systems: Leakage Surveys of Inside Meter Sets), 20 CSR 4240-40.030(15)(C) and Commission orders in Case No. GO-2002-50 and Case No. GO-93-343 as modified by the Unanimous Stipulation and Agreement in GO-99-155 (Unprotected Steel Service Line and Yard Line Replacements). As to these waivers the Staff has also recommended a series of conditions and limitations. Spire Missouri agrees to comply with the conditions and limitations set forth by Staff in its Recommendation as to these specific waivers, with exception to Staff's condition that work be completed with the oldest identified population of facilities first. Spire believes that inspections will be completed more quickly and therefore gas safety will be better maintained, by working to prioritize all delinquent inspections before targeting other inspections for completion. Spire will complete this work pending customer availability and provided the customer has no objection to a Company representative entering their buildings.

4. There are also a series of waiver requests that the Staff recommended the Commission deny approval of. As to these waivers, Spire will address each waiver individually below:

a. 20 CSR 4240-40.030(9)(Q)2. or 3., or 49 CFR 192.481(b) or (c). The Company did not intend to request a waiver from these rules and plans to continue to perform this work as scheduled.

b. 20 CSR 4240-40.030(13)(M)2.C., 20 CSR 4240-40.030(13)(M)3., or 49 CFR 192.723(b)(2). The Company did not intend to request a waiver from these rules and plans to continue to perform this work as scheduled.

c. Mandated Cast Iron Replacements – Rule 20 CSR 4240-40.030(15)(D) and Commission order in Case No. GO-2002-50 and Case No. GO-91-275. The Staff

recommends denial of these waiver requests without further clarification from Spire Missouri regarding the specific provisions of this rule and Commission orders from which a waiver is sought. To better clarify Spire Missouri's request, the Company is seeking a waiver from the mandated replacement dates as defined in Case Nos. GO-2002-50 and GO-91-275 which were developed in response to Commission Rule 20 CSR 4240-40.030(15)(D).

d. Unprotected Steel Main Replacements – Rule 20 CSR 4240-40.030(15)(E).

The Staff recommends the Commission deny approval of Spire Missouri's waiver request from this rule because the Company has indicated in past reports that it no longer has any unprotected steel transmission lines, feeder lines or mains. Staff further stated that if Spire Missouri has discovered previously unreported unprotected steel transmission lines, feeder lines or mains, this can be addressed by a separate waiver request that includes a schedule for replacement. Spire Missouri does not understand the need for a separate waiver request, as the Company's inability to timely complete these replacements are related to circumstances surrounding the COVID-19 pandemic. In addition, in Spire Missouri East's most recent quarterly report which was submitted to Staff on April 30th, the Company informed Staff of four segments of unprotected steel main that were found as part of the records review conducted by the Company. The Company is seeking a waiver from the mandated replacement dates for these segments.

5. The Staff has also recommended that Spire Missouri file a list of any non-compliances of Commission rules and orders that have occurred since May 15, 2020. Spire Missouri agrees to submit this information to the Commission Staff as proposed, but would prefer not to submit this information as a filing in the docket.

**WHEREFORE**, Spire Missouri, Inc. respectfully requests that the Commission consider and accept Spire Missouri's response to the Staff's Recommendation.

Respectfully submitted,

*/s/ Goldie T. Bockstruck* \_\_\_\_\_

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**ATTORNEY FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 3<sup>rd</sup> day of June, 2020.

*/s/ Goldie T. Bockstruck* \_\_\_\_\_

