

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

In the Matter of the Application of Roeslein)
Alternative Energy Services, LLC for a)
Permanent Waiver from Certain Provisions) **File No. GE-2023-0096**
of 20 CSR 4240-40.030 (MAOP))

STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, in response to the Commission’s September 13, 2022 *Order Directing Notice and Setting Deadlines for Intervention Applications and Staff’s Recommendation*, and for its Status Report states:

1. On September 12, 2022, Roeslein Alternative Energy Services, LLC (RAES), filed an *Application for Waivers*. RAES is requesting a permanent waiver of the requirement under Commission Rule 20 CSR 4240-40.030(3)(I)3.B.(I) limiting the design pressure for certain polyethylene pipe (PE) pipe to no more than 100 psig. RAES is requesting this in order to increase the maximum allowable operating pressure (MAOP) of an existing PE pipeline in Mercer County, Missouri to 125 psig. As RAES mentions in its application, the federal pipeline safety standards in 49 CFR 192.121 allow establishment of a MAOP of 125 psig, provided certain conditions are met.

2. On September 13, 2022, the Commission ordered Staff to file by October 13, 2022 either a recommendation regarding RAES’s application, or a status report indicating when it expects to file a recommendation.

3. Staff continues conducting discovery in this matter. Staff has submitted data requests (DRs) to RAES to obtain: a) Pipe material specifications and dimension information to determine conformance with the requirements specified

in 49 CFR 192.121(c), and b) Design variables and supporting documentation necessary to verify that an increased MAOP is supported by either of the design pressure formulae provided in 49 CFR 192.121(a).

4. Staff has initiated coordination with the Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding the federal pipe design limitations that are the subject of the RAES Application. Staff anticipates that following receipt of DR responses and Staff analysis, additional coordination with PHMSA may be required.

5. Staff anticipates that it will have completed its discovery and analysis and will be able to file its recommendation by November 30, 2022.

WHEREFORE, for the above-stated reasons, Staff requests that the Commission order Staff to file a report regarding its investigation, or a report on the investigation's progress, no later than November 30, 2022.

Respectfully submitted,

/s/ Jamie S. Myers

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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 Spire Missouri, Inc., and The Office of the Public Counsel on this 12th day of October, 2022.

/s/ Jamie S. Myers