

**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)

**MOTION TO MODIFY THE COMMISSION’S JUNE 15, 2020 ORDER
AND MOTION FOR EXPEDITED TREATMENT**

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 *Motion to Modify the Commission’s June 15, 2020 Order and Motion for Expedited Treatment* to extend the waiver granted by this Commission pertaining to Rule 20 CSR 4240-40.030(9)(Q)1 as to atmospheric corrosion inspections (“ACI”) and 20 CSR 4240-40.030(13)(M) as to leak surveys to March 31, 2021. In support of this filing, Spire Missouri respectfully states as follows:

1. On May 15, 2020, Spire Missouri filed a request for temporary waiver from certain Commission gas safety rules, including Rule 20 CSR 4240-40.030(9)(Q)1 (Federal Regulation 49 CFR 192.481(a)) and 20 CSR 4240-40.030(13)(M) (Federal Regulation 49 CFR 192.723(a)) in order to obtain additional time to complete the ACI’s and leak surveys that would require entry into residential customer premises. This request was made due to safety concerns directly attributable to the coronavirus pandemic.

2. On June 11th, the Commission issued its *Order Approving Application for Temporary Waiver and Directing Written Notice*, which allows the Company through

December 31, 2020 to complete its ACI's and leak surveys, subject to conditions. The Commission also issued its Notice to the U.S. Secretary of Transportation regarding the Commission's Order approving the Company's request for waiver.

3. On July 13th, PHMSA issued its Statement of No Objection to the Order.

4. When Spire Missouri made its request for waiver in May, it was unknown how long the coronavirus pandemic would impact the Company's ability to enter customer premises or how customers would respond during these unprecedented times to the Company continuing to conduct the ACI and leak survey work the Company has done for years. Spire Missouri has been working diligently to complete the ACI's and leak surveys, however, there is a relatively small number of customers that are still refusing entry into their homes due to the coronavirus pandemic. Absent a modification of the Order, the Company will not be able to complete the ACI's and leak surveys as specified in the Order.

5. The Company is hopeful that with more time coupled with enhanced customer outreach, that the ACIs and leak surveys can be completed by March 31, 2021. The Company is in the process of reforming its outreach approach to customers to increase awareness on procedures Spire Missouri has in place to perform these inspections both quickly and safely.

6. Spire Missouri agrees to continue to abide by the conditions set forth in the Order, however, the Company requests that the condition that the Company complete inspections of each noncompliant facility by no later than one year after the facility's delinquent date be removed or further modified to allow for an additional year for the

inspection to be completed. Without this modification, the Company will not be in compliance with the Order.

MOTION FOR EXPEDITED TREATMENT

7. Given the impending deadlines for these inspections and replacements, PHMSA's requirement that it receive at least 60 days' notice before an order is to go into effect, as well as ongoing issues regarding customer interaction during the COVID-19 pandemic, the Company submits that there is good cause to approve this application on an expedited basis and respectfully requests that the Commission issue an order by November 1, 2020 with an effective date of January 1, 2021 along with a notice of the order to the Secretary of Transportation, so that the Commission may meet PHMSA's 60 day notice requirement.

8. The Company believes the granting of this motion will slow the potential spread of COVID-19 and prevent the discontinuance of service to those customers who are concerned about COVID-19 during the winter heating season. The Company submits that there will be no negative impact on customers or the general public if the Commission grants such relief on an expedited basis. For all of these reasons, Spire Missouri submits that there is good cause for the Commission to approve its request.

9. This pleading was filed as soon as it could have been following the Company's formulation of its anticipated compliance shortfalls relating to completion of this work due to customer concerns related to the COVID-19 pandemic.

WHEREFORE, Spire Missouri, Inc. respectfully requests that the Commission approve the Company's *Motion to Modify the Commission's June 15, 2020 Order and Request for Expedited Treatment* consistent with the terms set forth herein.

Respectfully submitted,

/s/ Goldie T. Bockstruck

Goldie T. Bockstruck MoBar#58759
Director, Associate General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
314-342-0533 Office (Bockstruck)
314-421-1979 Fax
Email: Goldie.Bockstruck@spireenergy.com

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 16th day of October, 2020.

/s/ Goldie T. Bockstruck

