

**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)
20 CSR 4240-40.030 (9)(Q), (13)(M), (15)(C),) **File No. GE-2020-0373**
(15)(D) and (15)(E) and Orders Pertaining to)
Inspections and Replacements)

**RESPONSE OF SPIRE MISSOURI TO STAFF'S
FEBRUARY 2021 RECOMMENDATION**

COMES NOW Spire Missouri Inc. (“Spire” or “Company”), on behalf of its operating units, Spire Missouri East (“Spire East”) and Spire Missouri West (“Spire West”) and files this *Response of Spire Missouri to Staff's February 2021 Recommendation*. In support of this filing, Spire Missouri respectfully states as follows:

1. On January 18, 2021, Spire filed a *Motion to Modify the Commission's Order Extending Waiver and Motion for Expedited Treatment*. In its Motion, the Company requested that the Commission extend the waiver granted to the Company for atmospheric corrosion inspections and leak surveys from March 31, 2021 to October 31, 2021 due to ongoing customer concerns attributable to the coronavirus pandemic. In addition, the Company requested that the Commission remove the condition requiring inspections of non-compliant facilities be completed no later than one year after a facility's delinquent date.

2. On February 19, 2021, the Staff of the Missouri Public Service Commission filed its Recommendation regarding Spire's motion to extend the waiver in this case.

3. Spire has reviewed Staff's Recommendation and accompanying memorandum in its entirety and appreciates Staff's review and coordination with PHMSA in making its recommendation. The Company's request for an extension through October 31, 2021 was based on information that showed widespread availability of the vaccine would not be until fall of this year. The date requested contemplated the availability of the vaccine to all customers, not just those considered "high risk". While the latest information has shown that it is possible for widespread availability of the vaccine by this summer, Missouri has seen considerable delays in the rollout of the vaccine as compared to other states. While the Company understands Staff's rationale for its recommendation, Spire would request that the Commission consider additional time – through August 31, 2021 to increase the likelihood that any customer who is concerned about coronavirus, whether high risk or not, would have had the opportunity to have received the vaccine prior to the Company conducting the ACI and leak survey work.

4. Staff recommended that the modification of the one-year condition to the temporary waiver only be applicable to those customers who are able to show medical hardship. Spire can agree to this recommendation.

5. Staff also recommended that the Company conduct additional public awareness efforts in the form of educational materials to its customers delayed under the waiver on what to do if a customer smells gas, and the safety risks associated with corrosion and leaks on indoor facilities. The Company already provides some of this information to these customers as part of its public awareness efforts, and thinks this recommendation is reasonable. Spire is willing to comply with this recommendation.

6. The Staff has also recommended that the Commission establish an effective date that allows PHMSA 60 days to review the granted waiver extension and object prior to the effective date. Spire requests that the Commission word its order to allow for continuous application of the waiver beginning April 1, 2021 through the remainder of the waiver period.

WHEREFORE, Spire Missouri, Inc. respectfully requests that the Commission approve the Company's *Motion to Modify the Commission's Order Extending Waiver and Motion for Expedited Treatment* consistent with the terms set forth in Staff's recommendation with the following exception: the waiver be extended through August 31, 2021. The Company also requests the Commission issue its order in a manner that allows for continuous application of the waiver from April 1, 2021 through the extension period.

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 24th day of February, 2021.

/s/ Goldie T. Bockstruck
