

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

In the Matter of the Application of Spire Missouri)	
Inc. for a permanent waiver from the requirement)	
to use a “device” for overpressure protection)	Case No. GE-2023-0112
in 20 CSR 4240-40.030 (4), (12) and (13))	
for certain Spire East facilities)	

SUPPLEMENT TO APPLICATION

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), by and through counsel, and submits this Supplement to the Application in the above-captioned docket, stating the following:

1. On September 23, 2022, Spire Missouri filed an application for a waiver from the Rules of the Missouri Public Service Commission (“Commission”) to exempt its remaining regulator stations on its low-pressure system from requirements for additional devices to be installed at or near such stations to achieve overpressurization protection standards. In its Application, the Spire Missouri detailed the measures and processes already in place to ensure the Commission’s overpressurization protection goals are met. Spire Missouri is currently in the process of replacing the cast iron mains from its legacy low-pressure system, so installing additional devices at or near regulator stations that will be retired within the next three years would represent an unnecessary use of resources and costs on the Company and its customers.

2. Since filing the application, Spire Missouri has held discussions with Staff of the Commission to review the Company’s overpressurization protection processes. After these discussions, the Company will commit to additional measures to achieve the Commission’s overpressurization protection goals listed below for Staff’s review. The Company also commits

to the changes reflected in its Amended Exhibit D, its Low Pressure Overpressure Protection Program, which has been attached to this filing.

- For all remaining Reynolds stations Spire Missouri will complete weekly inspections to confirm stations are operating correctly and safely.
- Spire Missouri will complete monthly pressure and alarm testing with the control room.
- Spire Missouri will replace Reynolds stations that are currently a single feed into a downstream system with temporary modern monitor type stations prior to October 1, 2023, and replace other Reynolds stations prior to becoming a single feed into a downstream system.
- Spire Missouri will replace the one remaining station that is served by an intermediate pressure (IP) system prior to December 1, 2023.

3. Through these efforts, Spire Missouri further attests that safety will not be compromised for the duration of this waiver.

WHEREFORE, Spire Missouri requests that the Commission accept this Supplement to the Application in the above-captioned docket.

Respectfully submitted,

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all parties of record in this docket via electronic mail (e-mail) on this 27th day of July, 2023.

/s/ Lew Keathley
Lew Keathley

Amended Exhibit D

Low Pressure Overpressure Protection (“LPOP”) Program

The actions for the LPOP Program are as follows:

- a) Prior to each heating season, Spire Missouri will complete and implement annual travel stop calculations that ensure adequate capacity and overpressure protection for district regulator stations that are the subject of this application.
- b) Each calendar year, prior to March 1st, Spire Missouri will complete Low Pressure System Model studies simulating failures at 5% system loading for each subject regulator station.
- c) A field simulated wide open (to the travel stop) failure test (“quick” test) will be conducted on all remaining LPOP stations each calendar year until the system has been completely replaced. These tests will be conducted as promptly as practical considering the need to have favorable testing weather. For stations with overpressure characteristics (a test stopped at 14-inches w.c. or less, because the failure pressure would have been greater than 14.0” w.c.) confirmed by the “quick” tests required in this paragraph, Spire Missouri will immediately either adjust the travel stop setting to eliminate the overpressure characteristic and re-test, or place the existing station out of service. If a station continues to exhibit overpressure characteristics when retested, Spire may either 1) replace the existing Reynolds station with a temporary modern monitor-type station, 2) place the existing station out of service or 3) adjust station travel stop settings to eliminate the overpressure characteristic and re-test.