

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

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

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Staff Recommendation*, states:

1. On June 11, 2020, the Commission issued its *Order Approving Application for Temporary Waiver and Directing Written Notice* (“Order”) granting Spire Missouri, Inc. (“Spire”) an extension to its deadlines for completing Atmospheric Corrosion Inspections (“ACIs”) as required by 20 CSR 4240-40.030(9)(Q)1. and leakage surveys as required by 20 CSR 4240-40.030(13)(M)1., 20 CSR 4240-40.030(13)(M)2.A. and 20 CSR 4240-40.030(13)(M)2.B. The Order, corrected nunc pro tunc on June 16th, was limited to instances where Spire facilities were installed inside customer premises, and contained certain conditions and limitations.

2. On October 16, 2020, Spire filed its motion to modify the Order and moving for expedited treatment (“Motion”). That day the Commission ordered Staff to file a recommendation or status report no later than October 22, 2020, and later extended the due date to November 20, 2020.

3. Spire’s Motion requests the Commission extend the temporary waiver from December 31, 2020 to March 31, 2021, stating: “there is a relatively small number of customers that are still refusing entry into their homes due to the coronavirus pandemic.”

4. Based on Spire's responses to Staff discovery, Spire clarified that its requested extension for customers who refuse entry applies only to residential customers. As of October 27, 2020, Spire had documented 165 residential customers who referenced the coronavirus pandemic as the reason for not establishing appointments for Spire to enter the residence. Staff notes that there may be additional residential customers who will refuse entry due to the coronavirus pandemic as Spire requests appointments for the remaining 2020 inspections. Staff agrees with Spire that as of the October 27, 2020 documented refusals, there remains a relatively small number of customers to which this situation applies. Staff agrees that an additional three months to March 31, 2021 will not impact safety.

5. Customer safety is not compromised in this situation because of the small number of refusals, the short extension period, and Spire's safety protocols for entering a customer's residence. Spire has the ability to use a high level of personal protective equipment (PPE) when the Spire representative conducts the inside ACIs and leak surveys without coronavirus exposure to or from the customer.

6. Pipeline and Hazardous Materials Safety Administration ("PHMSA") guidelines for state pipeline safety programs encourage state programs to coordinate review of waiver requests with PHMSA prior to finalizing state approval. Staff submitted a copy of Spire's October 16th Motion to PHMSA the same day.

7. PHMSA asked Staff for an update of any issues that have resulted from the current temporary waiver and the delays beyond the compliance date for conducting the ACIs and leakage surveys. Staff issued data requests to Spire and Spire responded that there had been no issues or leaks involving the ACIs and leakage surveys that had been

delayed under the temporary waiver. PHMSA also requested to review a draft of Staff's recommended limitations and conditions appropriate to the Motion. Staff provided them to PHMSA on November 13th. PHMSA informed Staff it could move forward with its recommendations on November 17th.

8. Based on Staff's review of Spire's Motion, Spire's responses to Staff's data requests, and guidance from PHMSA, all more fully explained in Staff's Memorandum attached and incorporated herein as "Appendix A" with Supporting Attachment 1, Staff recommends the Commission grant Spire's Motion for an extension of its temporary waiver as follows and subject to certain conditions:

A. Staff recommends that the Commission grant Spire's request to extend the temporary waiver of compliance with the requirements of 20 CSR 4240-40.030(9)(Q)1. and 20 CSR 4240-40.030(13)(M)1. and 2.A. and B. from December 31, 2020 to March 31, 2021, for residential customers who refuse entry to the home due to the coronavirus pandemic, subject to the limitations and conditions listed below. Staff also recommends that the Commission establish an effective date that allows 60 days for PHMSA to review the granted waiver extension and have an opportunity to object prior to the effective date. Staff requests that the Commission's Order be promptly emailed to PHMSA in the same manner as the initial Order granting the temporary waiver. Recommended limitations and conditions relevant to the waiver extension are as follows:

1. Waiver extension ends on March 31, 2021;

2. Waiver of atmospheric corrosion monitoring and leakage surveys after December 31, 2020 applies only to Spire facilities inside residential customer premises in instances when the customer refuses entry to the Spire gas service technician or contractor, or refuses to make an appointment for entry, due to COVID-19 related concerns. Refusal of entry or appointment must be documented for each instance;

3. Spire shall document the number of incidents of noncompliance following December 31, 2020 and file a monthly update to the Commission that includes a list of the customers and documentation of the customer's reason for not allowing entry or appointment due to the coronavirus pandemic;

4. Spire shall conduct additional public awareness efforts to notify customers when atmospheric corrosion monitoring and leakage survey of facilities is delayed pursuant to this extension of the temporary waiver;

5. Spire shall conduct weekly odorant intensity tests, in accordance with the test requirements of 20 CSR 4240-40.030(12)(P)6., in areas where atmospheric corrosion monitoring and leakage surveys are delayed pursuant to this temporary waiver; and

6. Spire shall complete atmospheric corrosion monitoring and leakage surveys of each noncompliant facility by no later than one year after the facility's delinquent date.

B. Staff recommends that the Commission deny Spire's request to remove or modify the one-year condition to the temporary waiver because Spire has since determined that removal or modification of the Commission's one-year condition is no longer necessary to maintain compliance with the Commission's Order.

WHEREFORE, Staff prays the Commission accept its recommendations and conditions regarding Spire's Motion for an extension of its temporary waiver as set forth above and in Staff's attached Memorandum marked as "Appendix A" with Supporting Attachment 1.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Deputy Staff Counsel
Missouri Bar No. 51709

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-526-7779 (Voice)
573-751-9285 (Fax)
bob.berlin@psc.mo.gov

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case on this 20th day of November, 2020.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GE-2020-0373, Spire Missouri, Inc., d/b/a Spire

FROM: Kathleen A. McNelis, PE, Engineer Manager, Safety Engineering Department
John D. Kottwitz, Associate Engineer, Safety Engineering Department

/s/ Kathleen A. McNelis, PE 11/20/2020 /s/ Robert S. Berlin 11/20/2020
Safety Engineering Department/ Date Staff Counsel Division / Date

SUBJECT: Staff Recommendation Regarding Spire Missouri Motion to Modify the
Commission's June 11, 2020 Order

DATE: November 20, 2020

Background: First Waiver Granted by Commission and Case Status

The Commission issued its *Order Approving Application for Temporary Waiver and Directing Written Notice* ("Order") on June 11, 2020, and an *Order Nunc Pro Tunc* correcting the Order on June 16, 2020. The Order provided Spire Missouri, Inc. ("Spire") with an extension to required deadlines for completing Atmospheric Corrosion Inspections ("ACIs") as required by 20 CSR 4240-40.030(9)(Q)1. [corresponding federal regulation is 49 C.F.R. 192.481(a)], and leakage surveys as required by 20 CSR 4240-40.030(13)(M)1., 20 CSR 4240-40.030(13)(M)2.A. and 20 CSR 4240-40.030(13)(M)2.B. [corresponding federal regulations are 49 C.F.R. 192.723(a) and (b)(1)]. The Order was limited to instances where Spire facilities were installed inside customer premises, and contained certain conditions and limitations that are addressed below.

Copies of both orders were provided to the U.S. Secretary of Transportation. The Pipeline and Hazardous Materials Safety Administration (PHMSA) provided a letter dated July 13, 2020 stating that it did not object to issuance of this waiver by the Commission for the Spire Missouri East and Spire Missouri West pipeline facilities provided the Company complies with the conditions set forth in the waiver.

Spire's Motion, Coordination with PHMSA and Staff Analysis

Spire's October 16, 2020 Motion

Spire filed its motion to modify the Order on October 16, 2020. Subsequently on October 16, 2020, the Commission ordered Staff to file a recommendation or status report no later than October 22, 2020. Staff filed a status report on October 22 and now files its recommendation.

Paragraph 5 of Spire’s October 16, 2020 motion requests to extend the temporary waiver from December 31, 2020 to March 31, 2021, and paragraph 4 states: “there is a relatively small number of customers that are still refusing entry into their homes due to the coronavirus pandemic.” In response to Staff data requests, Spire clarified that the requested extension for customers refusing entry applies only to residential customers¹. As of October 27, 2020, Spire had documented 165² residential customers who referenced the coronavirus pandemic as the reason they were not establishing appointments for Spire to enter the residence. Staff notes that there may be additional residential customers who will refuse entry due to the coronavirus pandemic as Spire requests appointments for the remaining 2020 inspections. Staff agrees that as of the October 27, 2020 documented numbers, this involved a relatively small number of customers to which this situation applies and that an additional three months to March 31, 2021 will not impact safety. Customer safety is not compromised in this situation because of the relatively small number, the short extension period, and Spire’s safety protocols for entering a customer’s residence. Spire has the ability to use a high level of personal protective equipment (PPE) when the Spire representative conducts the inside ACIs and leak surveys without coronavirus exposure to or from the customer.³

Staff notes that in response to Staff data requests, Spire reported a larger number of customers failed to respond to requests for entry, as opposed to refusing due to coronavirus concerns, and that Spire plans to begin discontinuing service to those customers who do not respond. In response to Staff Data Request 0007 on October 21, 2020, Spire indicated that it would need to conduct 11,249 inspections or disconnect service for those customers by December 31, 2020 to comply with the Commission order. Spire provided additional information regarding the status in its October 29, 2020 response to Staff Data Request 0007.2:

- The Company has 2,339 pending appointments with customers that have due dates within the calendar year 2020.
- The Company has completed 1,369 ACIs since its last response.

¹ Spire response to Staff Data Request 0002.

² Spire response to Staff Data Request 0003.1.

³ Spire response to Staff Data Request 0004.

- There are 87 customers that have not been contacted yet due to the customer being new at the premises.
- Spire has attempted to contact 7,290 customers who have not responded.

Staff reviewed Spire's practices for notification to these customers⁴ prior to discontinuing service, and found the practices to comply with Spire's currently effective tariff.

Paragraph 6 of Spire's October 16, 2020 motion requests that the previously ordered 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. However, in response to Staff Data Request 0006⁵, Spire stated the oldest delinquent date for the remaining inspections is May 4, 2020, and that it has determined that removal or modification of the Commission's one-year condition is no longer necessary to maintain compliance with the Commission's Order. Therefore, Staff has determined there is no need for the Commission to grant Spire's request to remove or further modify the one-year condition.

Conditions and Limitations in Currently Effective Temporary Waiver in Case No. GE-2020-0373

The Commission's Orders issued June 11 and 16, 2020 in Case No. GE-2020-0373 granted a temporary waiver, subject to limitations and conditions, pertaining to requirements for:

- A. Atmospheric corrosion inspections required by 20 CSR 4240-40.030(9)(Q)1. [corresponding federal regulation is 49 CFR 192.481(a)], and
- B. Leakage surveys required by 20 CSR 4240-40.030(13)(M)1., (13)(M)2.A. and (13)(M)2.B. [corresponding federal regulations are 49 CFR 192.723(a) and (b)(1)],
to the extent that such ACIs and leakage surveys require entry into residential customer premises.

The conditions and limitations of the Commission Orders granting the temporary waiver are listed below.

⁴ Spire's Confidential practices were provided in response to Staff Data Request 0007.1.

⁵ See Supporting Attachment 1 to Appendix A.

The Commission granted Spire's application for temporary waiver from Commission Rule 20 CSR 4240-40.030(9)(Q)1. subject to the following limitations and conditions:

- a. Waiver is granted through December 31, 2020;
- b. Waiver of atmospheric corrosion monitoring applies only to Spire facilities inside customer premises and does not apply to facilities outside customer premises;
- c. Spire shall document the number of incidents of noncompliance and provide a monthly update to the Commission by submission directly to Staff;
- d. Despite this waiver, Spire shall identify accessible customer premises, such as schools and other buildings now closed to the public, and complete timely inspections of those facilities;
- e. Spire shall conduct additional public awareness efforts to notify customers when inspection of facilities is delayed pursuant to this temporary waiver. Spire shall file in this case a report on such efforts;
- f. Spire shall conduct weekly odorant intensity tests, in accordance with the test requirements of 20 CSR 4240-40.030(12)(P)6., in areas where atmospheric corrosion monitoring is delayed pursuant to this temporary waiver;
- g. Spire shall complete inspections of all noncompliant facilities, as required by 20 CSR 4240-40.030(9)(Q)1., by no later than December 31, 2020;
- h. Spire shall complete inspections of each noncompliant facility by no later than one year after the facility's delinquent date; and
- i. The one-year limit serves only to require compliance before December 31, 2020, for eligible facilities. The one-year limit does not extend the waiver period beyond December 31, 2020.

The Commission granted Spire's application for temporary waiver from Commission rules 20 CSR 4240-40.030(13)(M)1., 20 CSR 4240-40.030(M)2.A. and 20 CSR 4240-40.030(M)2.B., subject to the following limitations and conditions:

- a. Waiver is granted through December 31, 2020;
- b. Waiver of leakage surveys applies only to Spire facilities inside customer premises and does not apply to facilities outside customer premises;

- c. Spire shall document the number of incidents of noncompliance and provide a monthly update to the Commission by submission directly to Staff;
- d. Despite this waiver, Spire shall identify accessible customer premises, such as schools and other buildings now closed to the public, and complete timely surveys of those facilities;
- e. Spire shall conduct additional public awareness efforts to notify customers when inspection of facilities is delayed pursuant to this temporary waiver. Spire shall file in this case a report on such efforts;
- f. Spire shall conduct weekly odorant intensity tests, in accordance with the test requirements of 20 CSR 4240-40.030(12)(P)6., in areas where leakage surveys are delayed pursuant to this temporary waiver;
- g. Spire shall complete surveys of all noncompliant facilities, as required by 20 CSR 4240-40.030(13)(M)1., 20 CSR 4240-40.030(M)2.A. and 20 CSR 4240-40.030(M)2.B., by no later than December 31, 2020;
- h. Spire shall complete inspections of each noncompliant facility by no later than one year after the facility's delinquent date; and
- i. The one-year limit serves only to require compliance before December 31, 2020, for eligible facilities. The one-year limit does not extend the waiver period beyond December 31, 2020.

Staff reviewed these two sets of similar conditions and determined that conditions e., f. and h. apply and should be continued for the requested extension. Condition a. should be modified to reflect the requested extension to March 31, 2021. Condition b. should be modified to reflect that the extension request is limited to residential customers who refuse entry or an appointment. Condition c. should be modified so that a monthly update is filed with a list of the residential customers and reasons for refusing entry or an appointment. Condition d. should be removed since the extension request is limited to residential premises where the customers do not allow access. Conditions g. and i. were specific to the initial temporary waiver and do not need to be continued for this extension request.

Conditions and Limitations in Related Commission Waivers

The Commission has previously addressed conditions and limitations related to COVID-19 concerns in Case No. GE-2020-0297. This case involves a statewide waiver granted from 20 CSR 4240-40.030(12)(S)1.B., which requires operators of intrastate natural gas pipelines in Missouri to visually inspect accessible customer gas piping and all connected equipment at the time an operator physically turns on the flow of gas to a customer. The following conditions are required of natural gas system operators to qualify for waiver of 20 CSR 4240-40.030(12)(S)1.B.:

- A. The waiver shall only apply in instances where either the customer or the City/Company gas service technician has specific concerns related to COVID-19. Such concerns must be documented for each instance where the inspection required by 20 CSR 4240-40.030(12)(S)1.B. is not completed.
- B. Beginning September 1, 2020, the waiver shall only apply in instances when the customer refuses entry to the gas service technician due to COVID-19 related concerns. Refusal of entry must be documented for each instance where the inspection required by 20 CSR 4240-40.030(12)(S)1.B. is not completed.
- C. Documentation of decisions not to perform inspections required by 20 CSR 4240-40.030(12)(S)1.B. and customer refusal to allow entry shall be maintained by the operator for a minimum of five years, and shall be made available upon request to Commission Staff for inspection. [Note: The City/Company should receive written documentation from the customer whenever possible (i.e., customer has email). Where it is not possible to obtain written documentation from the customer, the City/Company shall document the date, time and name of customer along with a summary of the discussion.]
- D. Whenever an operator encounters a situation that requires the application of this waiver, the following additional actions shall be implemented to provide additional safety:
 - (1) If the meter turn on request is initiated by the customer contacting the operator, the operator must provide the customer with safety information during this initial contact. The information provided must include instructions on what to do if the customer smells gas, and an 800 or local phone number to call if customer has any questions after meter turned on.

- (2) If the meter turn-on is required due to actions initiated by operator, the operator must either perform the inside inspections as required by (12)(S)1.B., or provide safety information including instructions on what to do if the customer smells gas and an 800 or local phone number to call if the customer has any questions using a door hanger or other method that avoids in-home contact.
- (3) The operator shall conduct weekly odorant intensity tests, in accordance with the test requirements of 20 CSR 4240-40.030(12)(P)6., in areas where customer premises are not entered as required by 20 CSR 4240-40.030(12)(S)1.B.

Staff reviewed these conditions and determined that the general conditions regarding obtaining documentation related to customer refusal of entry and increased odor intensity testing are applicable to Spire's current request, which also involves situations related to customer refusal of entry. The specific conditions related to meter turn-on are not directly related to this case because it is not necessary to turn-off/turn-on the flow of gas in order to perform ACIs or leakage surveys.

Staff Coordination with PHMSA

The Commission has an annual certification from the U.S. DOT under 49 U.S.C. Section 60105 of 49 U.S. Code to implement its pipeline safety program. 49 U.S.C. 60118 addresses waivers of pipeline safety standards by state authorities. 49 U.S.C. 60118 (d) requires that:

If a certification under section 60105 of this title or an agreement under section 60106 of this title is in effect, the State authority may waive compliance with a safety standard to which the certification or agreement applies in the same way and to the same extent the Secretary may waive compliance under subsection (c) of this section. However, the authority must give the Secretary written notice of the waiver at least 60 days before its effective date. If the Secretary makes a written objection before the effective date of the waiver, the waiver is stayed. After notifying the authority of the objection, the Secretary shall provide a prompt opportunity for a hearing. The Secretary shall make the final decision on granting the waiver.

In guidelines provided by PHMSA to state pipeline safety programs, PHMSA encourages state programs to coordinate review of waiver requests with PHMSA prior to finalizing state approval. Staff therefore submitted a copy of the Spire Motion to Modify the Commission's Order to PHMSA for review on October 16, 2020.

PHMSA indicated that it would like an update of any issues that have resulted from the current temporary waiver and the delays beyond the compliance date for conducting the ACIs and leakage surveys. Staff sent data requests to Spire and Spire responded that there had been no issues or leaks involving the ACIs and leakage surveys that had been delayed under the temporary waiver.⁶ PHMSA also requested to review a draft of Staff recommended limitations and conditions with respect to the motion. Staff provided these to PHMSA for review on November 13, 2020. PHMSA indicated that Staff could move forward with its recommendations on November 17, 2020.

Staff Recommendation to Grant Extension of Temporary Waiver Subject to Conditions

1. Staff recommends that the Commission grant Spire's request to extend the temporary waiver of compliance with the requirements of 20 CSR 4240-40.030(9)(Q)1. and 20 CSR 4240-40.030(13)(M)1. and 2.A. and B. from December 31, 2020 to March 31, 2021, for residential customers who refuse entry to the home due to the coronavirus pandemic, subject to the limitations and conditions listed below. Staff further recommends that the Commission establish an effective date that allows 60 days for PHMSA to review the granted waiver extension and have an opportunity to object prior to the effective date.⁷ Staff requests that the Commission's Order be promptly emailed to PHMSA in the same manner as the initial Orders granting the temporary waiver. Recommended limitations and conditions relevant to the waiver extension are as follows:

- A. Waiver extension ends on March 31, 2021;
- B. Waiver of atmospheric corrosion monitoring and leakage surveys after December 31, 2020 applies only to Spire facilities inside residential customer

⁶ Spire response to Staff Data Request 0005.

⁷ Staff advises that waiver of 20 CSR 4240-40.030(9)(Q)1. requires waiver of 49 C.F.R. 192.481(a) and waiver of 20 CSR 4240-40.030(13)(M)1. and 2.A. and B. requires waiver of 49 C.F.R. 192.723(a) and (b)(1).

premises in instances when the customer refuses entry to the Spire gas service technician or contractor, or refuses to make an appointment for entry, due to COVID-19 related concerns. Refusal of entry or appointment must be documented for each instance;

- C. Spire shall document the number of incidents of noncompliance following December 31, 2020 and file a monthly update to the Commission that includes a list of the customers and documentation of the customer's reason for not allowing entry or appointment due to the coronavirus pandemic;
 - D. Spire shall conduct additional public awareness efforts to notify customers when atmospheric corrosion monitoring and leakage survey of facilities is delayed pursuant to this extension of the temporary waiver;
 - E. Spire shall conduct weekly odorant intensity tests, in accordance with the test requirements of 20 CSR 4240-40.030(12)(P)6., in areas where atmospheric corrosion monitoring and leakage surveys are delayed pursuant to this temporary waiver; and
 - F. Spire shall complete atmospheric corrosion monitoring and leakage surveys of each noncompliant facility by no later than one year after the facility's delinquent date.
2. Staff recommends that the Commission deny Spire's request to remove or modify the one-year condition to the temporary waiver because Spire has since determined that removal or modification of the Commission's one-year condition is no longer necessary to maintain compliance with the Commission's Order.⁸

⁸ See Supporting Attachment 1 to Appendix A.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

**AFFIDAVIT OF KATHLEEN A. McNELIS, P.E.
AND JOHN D. KOTTWITZ**

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COME NOW Kathleen A. McNelis, P.E. and John D. Kottwitz, on their oath declare that they are of sound mind and lawful age; that they contributed to the foregoing *Staff Recommendation* in Memorandum form; and that the same is true and correct according to their best knowledge and belief, under penalty of perjury.

Further your Affiants sayeth not.

/s/ Kathleen A. McNelis, P.E.
Kathleen A. McNelis, P.E.

/s/ John D. Kottwitz
John D. Kottwitz

Missouri Public Service Commission

Respond Data Request

Data Request No.	0006
Company Name	Spire-Investor(Gas)
Case/Tracking No.	GE-2020-0373
Date Requested	10/19/2020
Issue	General Information & Miscellaneous - Safety
Requested From	Lew Keathley
Requested By	Jamie Myers
Brief Description	Paragraph 6 clarification
Description	<p>Paragraph 6 of Spire's October 16, 2020 motion to modify the Commission's June 15, 2020 order states: "... 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."</p> <p>A. Please explain why the Spire will not be compliance with the Commission's June 15, 2020 Order if the one-year condition is not removed or modified. B. Currently, what is the oldest delinquent date for remaining inspections (atmospheric corrosion inspections and leak surveys of inside service line and meter facilities) that need to be conducted by December 31, 2020 to comply with the Commission June 15, 2020 order? C. Is Spire currently in compliance with the Commission's June 15, 2020 Order to complete inspections of each noncompliant facility by no later than one year after the facility's delinquent date? If "no" please provide a listing of facilities for which Spire is currently not in compliance with this requirement. D. Please explain why Spire's request for the modification option is to allow for an additional year to complete the inspection. E. Please explain how the addition of one year was determined and whether a shorter length of time would be sufficient. DR requested by Kathleen McNelis (kathleen.mcnelis@psc.mo.gov) and John Kottwitz (john.kottwitz@psc.mo.gov). (NOTE: The company responses may be provided by the MOPSC to PHMSA)</p>
Response	<p>A) After review of the current customers subject to this modified waiver request, the Company has determined that removal or modification of the Commission's one-year condition is no longer necessary to maintain compliance with the Order. B) The oldest delinquent date for the remaining inspections is May 4, 2020. C) Yes. D) Please see the Company's response to Staff DR 6 A. E) Please see the Company's response to Staff DR 6 A.</p>
Objections	NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GE-2020-0373** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **Spire-Investor(Gas)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters,

memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **Spire-Investor(Gas)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security : Public
Rationale : NA