

**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)

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Motion for Extension*, states as follows:

1. On January 18, 2021, Spire Missouri Inc. d/b/a Spire, filed a motion to modify the Commission’s December 2, 2020 *Order Modifying Temporary Waiver and Directing Written Notice*. Spire requests the Commission extend the period of the waiver from March 31 to October 31, 2021. Spire also requests the Commission remove the one-year limit on noncompliance for any location, which is required as a condition of waiver by the Commission’s June 11, 2020 *Order Approving Application for Temporary Waiver and Directing Written Notice*.

2. On January 19, 2021, the Commission issued an order and directed Staff to file an expedited recommendation by no later than 10 a.m. January 25, 2021.

3. Staff has reviewed Spire’s current request and provided a copy of it to the Pipeline Hazardous Materials Safety Administration (“PHMSA”). Staff has discussed the request with PHMSA and together developed a set of questions for Spire. Staff issued a number of data requests to Spire on January 20, 2021, seeking answers to its questions. At the time of preparing this filing, Spire has responded to many of these data requests, but Staff is still awaiting Spire’s full or partial response to a few outstanding data requests.

Staff will also need time to review all of Spire's responses and conduct any follow-up, as needed.

4. Staff will continue to make best efforts to expedite its review of Spire's current request, but in order for Staff to make an informed recommendation to the Commission, Staff requests additional time to do so. Staff requests the Commission allow Staff to file its recommendation no later than February 17, 2021. If Staff is finished with its review and recommendation before February 17, 2021, Staff will file its recommendation at the time.

WHEREFORE, Staff respectfully requests the Commission grant this *Motion for Extension* and permit Staff to file its recommendation no later than February 17, 2021; and grant such other and further relief as the Commission considers just in the circumstances.

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, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 25th day of January, 2021.

/s/ Jamie S. Myers