

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

In the Matter of the Notice and Application of    )  
Spire Missouri Inc. Regarding Completion of its)  
Residential and Small Commercial Service/    )  
Yard Line Replacement Program and Program )  
to Address Remaining Yard Lines Owned by    )  
its Commercial and Industrial Customers in its )  
Spire East and Spire West Service Territories )

**Case No. GE-2020-0294**

**RESPONSE TO ORDER DIRECTING FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission, through counsel, and in response to the Commission's June 29, 2020 *Order Directing Filing* states:

1. On June 22, 2020 Staff filed its *Staff Recommendation and Memorandum* in this matter, recommending that the Commission approve the March 20, 2020 application of Spire Missouri Inc. d/b/a Spire ("Spire") seeking (1) approval of a program addressing remaining unprotected steel yard lines owned by large commercial and industrial customers and (2) waivers extending the deadlines for completing these replacements to December 31, 2025.

2. In its June 29, 2020 *Order Directing Filing*, the Commission stated that Staff recommended waiver of the Commission's June 11, 2020 *Order on Application for Temporary Waivers* ("Order") in Case No. GE-2020-0373, while this Order expressly excludes large commercial and industrial yard lines.<sup>1</sup> The Commission ordered Staff to clarify its June 22, 2020 filing with the current deadlines for replacing unprotected steel

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<sup>1</sup> "Spire's application does not seek a waiver in regard to large commercial and industrial yard lines." *Order on Application for Temporary Waivers*, P. 2 (Jun. 11, 2020).

yard lines owned by large commercial and industrial customers and the file numbers of relevant Commission orders.

3. As the Commission notes, the Commission's Order in Case No. GE-2020-0373 is not applicable to large commercial and industrial yard lines; therefore, Staff clarifies that no action related to the Commission's Order in Case No. GE-2020-0373 is needed in this case.

4. The current deadlines for replacing unprotected steel yard lines owned by large commercial and industrial customers in Spire's Spire East territory is December 31, 2020, as set in Case No. GO-99-155.<sup>2</sup> The deadline in Spire's Spire West territory is June 30, 2020, as set in Case No. GO-2002-50.<sup>3</sup>

5. Therefore, regarding Spire's request for waivers, Staff recommends that the Commission approve waivers from the requirements of 20 CSR 4240-40.030(15)(C) and the Commission's orders in Case Nos. GO-99-155 and GO-2002-50. Staff further renews its recommended conditions listed on pages three and four of its *Memorandum*.

**WHEREFORE**, Staff submits this response to the Commission's June 29, 2020 *Order Directing Filing*.

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<sup>2</sup> *Order Approving Stipulation and Agreement*, GO-99-155 (May 18, 2000) (modifying and granting waivers from GO-93-343).

<sup>3</sup> *Order Approving Application*, GO-2002-50 (Sep. 20, 2001) (modifying and granting waivers from GO-99-302).

Respectfully submitted,

**/s/ Karen E. Bretz**

Karen E. Bretz

Senior Counsel

Missouri Bar No. 70632

Attorney for the Staff of the

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5472 (Voice)

573-751-9285 (Fax)

[Karen.Bretz@psc.mo.gov](mailto:Karen.Bretz@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 2<sup>nd</sup> day of July, 2020.

**/s/ Karen E. Bretz**