**UNITED STATES OF AMERICA**
**BEFORE THE**
**FEDERAL ENERGY REGULATORY COMMISSION**

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| **Spire STL Pipeline LLC** | ) | **Docket No. CP17-40-006** |

# COMMENTS OF SPIRE STL PIPELINE LLC ON DRAFT ENVIRONMENTAL IMPACT STATEMENT

Spire STL Pipeline LLC ("Spire STL") provides the following comments in response to the Federal Energy Regulatory Commission ("Commission") Staff's Draft Environmental Impact Statement ("EIS"), issued on June 17, 2022, for the Spire STL Pipeline ("Project"),[1] and provides the attached Visual Screening Plan, as recommended in the Draft EIS.[2]

The Draft EIS correctly concludes there are no significant environmental impacts associated with continued operation of the Spire STL Pipeline.[3] This is consistent with the conclusion the Commission reached in the original Certificate Order[4] when it issued a certificate to Spire STL authorizing the construction and operation of the Project. The Commission prepared a 469-page environmental assessment ("EA") for the Project in 2017, which concluded that the Project would not have significant environmental impacts

[1] Draft Environmental Impact Statement for the Spire STL Pipeline Project, Docket No. CP17-40-006 (June 17, 2022). The Commission originally issued what it called a "Draft Supplemental Environmental Impact Statement" for the Spire STL Project on June 16, 2022, but issued an errata notice on June 17, 2022, explaining the document had been incorrectly titled, and reissued the Draft EIS. *See* Errata Notice, Docket No. CP17-40-006 (June 17, 2022).

[2] Draft EIS at 4-17.

[3] The Draft EIS does not characterize the Project's impacts on global climate change as significant or insignificant because "the Commission is conducting a generic proceeding to determine whether and how the Commission will conduct significance determinations going forward." Draft EIS at 4-23. The Draft EIS does conclude, however, that "Spire has considered and taken practicable steps for reducing methane emissions." *Id*. at 4-25.

[4] *Spire STL Pipeline LLC*, 164 FERC ¶ 61,085, at P 263 (2018) ("Certificate Order"), *order amending certificate*, 169 FERC ¶ 61,074, *order on reh'g*, 169 FERC ¶ 61,134 (2019), *remanded*, *Envtl. Def. Fund v. FERC*, 2 4th 953 (D.C. Cir. 2021), *cert. denied sub nom.*, *Spire Mo., Inc. v. Envtl. Def. Fund*, 142 S. Ct. 1668 (2022).

if Spire STL constructed and operated the Project in accordance with the 22 environmental conditions included therein.[5] The Commission included these 22 environmental conditions in the Certificate Order.[6] The Draft EIS acknowledges that, in general, the Project's environmental impacts "are unchanged from the 2017 EA."[7] The Draft EIS also acknowledges that most of the Project's environmental impacts were previously captured in the EA, and focuses on the Project's impacts on environmental justice ("EJ") communities and climate change.[8]

The Draft EIS properly acknowledges that the Project has already been built and is currently operating. As such, the vast majority of the Project's environmental impacts ***occurred in the past***. At this point in time, the most substantial environmental impacts that could result from the Project would occur only in the event the Commission forces Spire STL to shut down.[9] The Draft EIS does not fully reflect the two general consequences of a shut-down: (1) the immediate environmental impacts resulting from decommissioning the Project, and (2) the farther-reaching environmental and economic consequences resulting from the loss of gas supply the Project currently provides.

With respect to the first issue, the Draft EIS correctly acknowledges that decommissioning by removal "would appear to impact the environment in a manner similar to that of pipeline construction (as assessed in the 2017 EA)."[10] Nonetheless, the Draft EIS's discussions of the Project's impacts on EJ communities and climate change do

[5] Environmental Assessment for the Spire STL Pipeline Project, Docket Nos. CP17-40-000, -001, at 161-68 (Sept. 29, 2017).
[6] Certificate Order at ordering para (B)(3) and App.
[7] Draft EIS at ES-3, 1-5.
[8] *Id.* at ES-3.
[9] *See generally* Request of Spire STL Pipeline LLC for Expedited Reissuance of Certificates, Docket Nos. CP17-40-000, at 59-63, Att. D (Environmental Report) (Nov. 12, 2021) ("Request for Reissuance").
[10] Draft EIS at 3-3.

not fully consider the adverse consequences of shutting down the pipeline. The Final EIS should recognize that abandonment of the Project, particularly if it is removed from the ground, would likely impact EJ communities and result in additional greenhouse gas ("GHG") emissions.

Nor does the Draft EIS fully consider the farther-reaching impacts of shutting down the Project: there is no dispute that the gas it now supplies would need to be replaced. The Draft EIS acknowledges that this would require alternative gas supply projects, including new pipeline construction, to be built by third-party pipeline providers, Spire Missouri, or (more likely) both. The cost of construction has risen dramatically since Spire STL entered service.[11] Any replacement construction will result in additional cost to consumers, and that impact is likely to have a disproportionate impact on EJ communities given the demographics in the St. Louis metropolitan area.[12] The Final EIS must make it clear that shutting down the Project would cause adverse environmental and socioeconomic impacts on EJ communities, beyond those described in the Draft EIS. This context is critical to understanding the options before the Commission today, and must be reflected in its consideration of the Project's impacts on EJ communities and climate change.

Thus, the Draft EIS's analysis of the Project's impacts on EJ communities and climate change should be modified to better reflect that comparable, if not greater, impacts would occur if the so-called No-Action Alternative is adopted, and the pipeline is removed from service. With that in mind, Spire STL provides the following comments on the

[11] Producer prices for construction rose 19.2 percent from June 2021 to June 2022. Bureau of Labor Statistics, *Producer prices for goods up 17.9 percent from June 2021 to June 2022* (July 20, 2022), https://www.bls.gov/opub/ted/2022/producer-prices-for-goods-up-17-9-percent-from-june-2021-to-june-2022.htm.

[12] Approximately 60% of people living in Spire Missouri's eastern Missouri service area are people of color and approximately 45% are low-income. *See infra* at 10.

Draft EIS's discussion of alternatives to the Project, impacts on EJ communities, and GHG emissions.

## I. Visual Screening Plan

The Draft EIS recommends that prior to the end of the Draft EIS comment period, Spire STL should prepare and file a Visual Screening Plan to minimize visual impacts on the residences near the Laclede/Lange and Chain of Rocks Delivery Stations. The Draft EIS states that the plan should include vegetation plantings or fence treatments to provide a visual buffer.[13] Consistent with the Draft EIS's recommendation, Spire STL has attached a Visual Screening Plan as Appendix A to these comments.

The Visual Screening Plan addresses the visual impacts of the Laclede/Lange and Chain of Rocks Delivery Stations that were identified in the Draft EIS. With respect to the Laclede/Lange Delivery Station, the Draft EIS notes the station is visible from the adjacent Fort Bellefontaine Road and Blue Spruce Lane and that passersby have unobstructed views of the meter station surrounded by a chain link.[14] In the attached Visual Screening Plan, Spire STL proposes additional mitigation measures to minimize visual impact from the Laclede/Lange Delivery Station. Specifically, Spire STL proposes to replant a large area along the length of the station boundary on Fort Bellefontaine Road with native prairie grasses and to plant additional landscaping bushes along the road at the top of the slope to provide additional layers of visual buffering. In addition, Spire STL proposes to install 75% privacy slats along the entire length of the existing chain link fence surrounding the station. As shown on the Visual Screening Plan, this will provide a significant visual screening along Blue Spruce Lane.

[13] Draft EIS at 4-17, 5-1.
[14] *Id.* at 4-15.

With respect to the Chain of Rocks Delivery Station, the Draft EIS notes the facility is directly adjacent to Prigge Road, with no vegetation buffering on the west or south sides of the site, and the facility is visible from the road.[15] As noted on Spire STL's Visual Screening Plan, the north and east sides of the facility are currently obstructed by well-established trees and brush. The field on the south side of the facility is 15-20 feet higher than Prigge Road and obstructs the public's view from that direction. To further reduce visual impacts, Spire STL proposes to plant additional hedgerow-type landscaping along the fenceline along Prigge Road. In addition, Spire STL proposes to install 75% privacy slats along the entire chain link fence panels, which will obscure the meter station facilities along Prigge Road. As demonstrated in the Visual Screening Plan, these measures will address and minimize visual impacts to residences and other institutions in proximity to the Laclede/Lange and Chain of Rocks Delivery Stations.

## II. Comments on the Draft EIS

### A. The Alternatives "Scenarios" Identified in the Draft EIS Should Be Reclassified as "Consequences" of Shutting Down the Project.

The Draft EIS correctly recognizes that adopting the "No-Action Alternative" and shutting down the Project would cause environmental impacts associated with decommissioning and disposition of the facilities, and would require third-party interstate pipeline companies and Spire Missouri to build infrastructure to replace it. However, the Draft EIS inaccurately characterizes these outcomes as "scenarios," when in fact, they are "consequences" of adopting the No-Action Alternative of shutting down the Project.

The Draft EIS describes "decommissioning and disposition of the . . . facilities" as "scenario 1," third-parties constructing replacement infrastructure as "scenario 2," and

[15] Draft EIS at 4-15 – 4-16.

Spire Missouri constructing replacement infrastructure as "scenario 3."[16] The term "scenario" suggests that these are not inevitable results of a shut-down of the Spire STL Pipeline, and instead, that they are alternatives that might occur. Shutting down the Project would certainly require decommissioning and disposition. This would be accomplished by either abandonment in place or removal.[17] It would also require the construction of replacement facilities by some combination of Spire Missouri and different third-party interstate pipeline companies, each of which may be considered a different alternative of shutting down the Project. Accordingly, the "scenarios" should instead be referred to as "consequences" of a decision by the Commission to shut down operation of the Project. This change will better reflect the consequences of a shut-down of the Project and correct the erroneous suggestion that they are mutually exclusive scenarios. The change will also allow Commission Staff to properly frame its analysis of the alternatives to the proposed action.

The Draft EIS analyzes alternatives to the proposed action that are not currently identifiable and feasible. The Draft EIS looks at a range of alternatives that would be needed in the event the Commission adopts the No-Action Alternative (not issuing a certificate to Spire STL and requiring Spire STL to cease operations). As acknowledged in the Draft EIS, if the No-Action Alternative were adopted, the "supplies of gas currently delivered by Spire STL will no longer be provided."[18] Despite making that reasonable statement, the Draft EIS continues that Spire Missouri "*may* need to seek out alternative

[16] Draft EIS at ES-4 – ES-5, 3-1 – 3-11.
[17] *See* Request for Reissuance, Att. D, Environmental Report, at 3-1 (discussing potential need for pipeline removal in the event the Commission shuts the Project down).
[18] Draft EIS at 3-12.

sources of natural gas as replacement, *potentially* through construction of a new natural gas pipeline system or modification to existing natural pipeline systems by other parties."[19]

This conclusion understates the gravity of the situation that would occur if FERC adopts the No-Action Alternative and shuts down the Spire STL Pipeline. First, if Spire STL ceases to operate, Spire Missouri will definitely—not *maybe*—need to seek alternative sources of gas.[20] Second, the Draft EIS itself makes clear that construction of alternative pipeline facilities would not just be *potential*—it would be a foregone conclusion. The Draft EIS explains that both the system alternatives analyzed—the Natural Gas Pipeline Company of America, LLC and MoGas Pipeline LLC alternatives—would require construction of additional facilities. The Draft EIS also points out that Spire Missouri would very likely need to build additional facilities on its system to address the absence of Spire STL. Therefore, the need for additional facilities to replace Spire STL in the event the Commission shuts down the Project is not just potential—it is certain. Finally, the Draft EIS accurately points out that there are currently no proposals to build any of these alternative facilities, which means it would likely take years to replace the capacity lost if Spire STL is forced to shut down. The Commission's Final EIS should acknowledge these facts.

[19] *Id*. (emphasis added).
[20] *See* Comments of Spire Missouri Inc. in Support of the Application of Spire STL Pipeline LLC for a Temporary Emergency Certificate, or, in the Alternative, Limited-Term Certificate, Docket No. CP17-40-007 (Sept. 7, 2021).

### B. The Draft EIS Correctly Finds That Continued Operation of the Project Will Not Significantly Impact EJ Communities, But Fails to Consider the Project's Positive Economic and Energy Impacts on EJ Communities.

The Draft EIS correctly concludes that the proposed action (i.e., the ongoing operation of the STL Pipeline Project) would not significantly impact EJ communities.[21] The Draft EIS also finds that impacts of the STL Pipeline Project's pipeline facilities on EJ communities are generally minor and have been addressed. With respect to the existing aboveground facilities—the Laclede/Lange Delivery Station and the Chain of Rocks Delivery Station—the Draft EIS states that impacts of these facilities are predominately borne by EJ communities but finds that their impacts on EJ communities are "less than significant."[22] This conclusion includes impacts on air quality, noise quality, and visual resources.[23] However, because of the proximity of these two aboveground facilities to the nearest residences and the lack of vegetation screening of these facilities from certain locations, the Draft EIS recommends that Spire STL file a Visual Screening Plan to minimize visual impacts on nearby residences.[24] As noted above, Spire STL has attached a Visual Screening Plan to comply with the recommendation, which further reduces the visual impacts of the stations.

The Draft EIS, however, fails to consider the Project's economic and energy-related impacts on EJ communities. This is an important component of the EJ analysis. The Draft EIS correctly recites the directive of Executive Order 12898 that federal agencies consider any "disproportionately high and adverse human health or environmental effects"

[21] Draft EIS at ES-3 – ES-4, 4-18 – 4-19.
[22] *Id.* at ES-4, 4-18.
[23] The Draft EIS reiterates the EA's findings that the Project satisfies applicable standards related to air and noise quality.
[24] *Id.* at 4-17, 5-1.

of their actions on EJ communities.[25] However, the Draft EIS ignores that Executive Order 12898 also directs agencies, as part of their "EJ" analysis, to "collect, maintain, and analyze information [on the] . . . ***economic effect*** on the surrounding populations."[26] Additionally, interagency guidance suggests agencies identify and consider unique conditions of EJ communities that may be affected by a proposed action, including socioeconomic vulnerabilities,[27] which in this case should include the socioeconomic effects of adopting the No-Action Alternative (i.e., shutting the pipeline down).

Spire STL provided a detailed assessment of the Project's impacts on EJ communities, which discussed the Project's economic and energy-related impacts on EJ communities, and the effects a shut-down of the Project would have on EJ communities ("EJ Analysis").[28] The Draft EIS ignores this analysis and does not consider the relationship between the Project and EJ communities' economic and energy security interests. Specifically, the Draft EIS ignores (i) the Project's economic impacts on EJ communities, including the positive impacts the Project already has conferred on EJ communities and the adverse impacts that EJ communities would suffer if the No-Action Alternative were adopted and the Project was shut down; and (ii) the environmental impacts shutting down the Project would have on EJ communities, particularly if the Commission requires removal. These are discussed below.

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[25] Draft EIS at 4-1 (citing Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, Exec. Order No. 12,898, 59 Fed. Reg. 7,629, at 7629, 7632 (Feb. 11, 1994)).
[26] Exec. Order No. 12,898, 59 Fed. Reg. at 7631, § 3-302(a)-(b) (emphasis added).
[27] EPA, *Promising Practices for EJ Methodologies in NEPA Reviews: Report of the Interagency Working Group on Environmental Justice & NEPA Committee*, at 16 (Mar. 2016), https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf.
[28] Spire STL Pipeline LLC, Supplemental Information and Scoping Comments, Docket No. CP17-40-006 (Jan. 14, 2022).

### *1. The Draft EIS Fails to Consider the Project's Positive Economic and Energy-Related Impacts to EJ Communities.*

The Draft EIS ignores the substantial benefits the Spire STL Pipeline provides to EJ communities. As explained in the EJ Analysis, of the roughly two million residents living within Spire Missouri's eastern Missouri service area, an estimated 657,820 people live in EJ communities.[29] Approximately 60% of these individuals are people of color and approximately 45% are low-income.[30]

The EJ Analysis explains that the Spire STL Pipeline "reduces the overall costs of delivered natural gas" to EJ communities, including during severe weather events when prices spike.[31] It also explains that EJ communities are more susceptible to energy insecurity and that by providing abundant gas supplies from diverse locations, the Project reduces energy insecurity, particularly during emergency events.[32] The Spire STL Pipeline also provides reliability benefits to these customers and enhances their energy security.

The EJ Analysis states that EJ communities tend to bear a higher burden of energy costs than members of other communities. The EJ Analysis also explains that "households at or below the poverty threshold spend on average 7.2 percent of their income on energy bills, compared to 2.3 percent spent in households above the poverty threshold."[33] The Spire STL Pipeline reduces the delivered costs of natural gas and, therefore, the Spire STL Pipeline provides ***a disproportionately positive economic impact*** on EJ communities.

[29] Spire Missouri relies on the Spire STL Pipeline to service customers in the eastern Missouri service area.
[30] EJ Analysis, at A-1.
[31] *Id*. at 4.
[32] *Id.* at 4-5, B-15.
[33] *Id.* at B-13.

Adoption of the No-Action Alternative and "[r]emoval of the Spire STL Pipeline from service could adversely impact EJ communities in the region disproportionately."[34]

Authorizing the Spire STL Pipeline to remain in service will benefit EJ communities. The Spire STL Pipeline is essential to Spire Missouri's ability to provide reliable and economic gas service to EJ communities in its eastern Missouri service area. Further, as the EJ Analysis explains, "[c]ontinued operation of the [Spire STL] Pipeline will ensure sufficient natural gas availability to support future growth in the region."[35]

#### *2. The Draft EIS Fails to Consider the Adverse Economic and Energy-Related Impacts Removal of the Project Would Have on Spire Missouri Customers in St. Louis and EJ Communities in Particular.*

The Draft EIS ignores the significant impacts shutdown of the Spire STL Pipeline would have on EJ communities. As the EJ Analysis explains, removal of the Project from service would result in residents of EJ communities paying higher utility rates and facing a higher risk of natural gas supply shortages.[36] It would take years to replace the Spire STL Pipeline and, given the rate of inflations since the Spire STL Pipeline was constructed, it can be expected to cost significantly more with those costs reflected in the rates paid by consumers.[37] Gas supply shortages would persist while replacement facilities are proposed, evaluated, and built, likely leading members of EJ communities to bear the burden of increased energy costs during this period. Assuming replacement facilities could be built, their costs would almost certainly exceed those of the existing pipeline.

[34] *Id.* at B-4; *see also id.* at 2, 3.
[35] EJ Analysis at 6, B-9.
[36] *Id.* at B-10.
[37] *See* note 11, *supra*.

Further, the EJ Analysis explains that if the Project is shut down, "[v]ulnerable populations within EJ communities in the Spire Missouri eastern Missouri service area, such as older adults and children, would be more susceptible to direct and indirect impacts of energy shutoffs and rate increases."[38] Specifically, "EJ communities within the Spire Missouri eastern Missouri service area may have a 92 percent increased risk of being impacted by a service interruption or energy blackouts if the Spire STL Pipeline is removed from service."[39] The Commission should incorporate this analysis into its Final EIS and its decision-making process.

### C. The Final EIS Should Discuss the Project's Actual GHG Emissions and Recognize the Reductions in Emissions Made Possible by the Project.

The Draft EIS contains a few mistakes and omissions in its analysis of GHG emissions associated with the Project. As explained below, the Draft EIS leaves it unclear whether it is relying on the estimate of carbon dioxide equivalent ("$CO_{2e}$") emissions provided in 2017, before the Project entered service, or the far lower $CO_{2e}$ emissions that actually result from operation of the Project, as shown with actual data from 2020 and 2021. Further, the Draft EIS ignores the reductions in GHG emissions that have resulted from the Project, and the likely increase GHG emissions that would result if the Project were to be removed from service.

#### *1. The Draft EIS Should Use the Actual $CO_{2e}$ Emissions Data for Project Operations Presented by Spire STL.*

It is unclear which data the Draft EIS uses to quantify $CO_{2e}$ emissions that result from operation of the Project. The Draft EIS appears to rely on estimates of $CO_{2e}$ emissions provided in 2017, prior to the Project's commencement of service, and fails to incorporate

[38] EJ Analysis at B-14.
[39] *Id*.

fully actual $CO_{2e}$ emissions data that Spire STL provided in response to a Commission Staff data request.[40]

The Draft EIS states, "GHG emissions associated with operation of the Spire STL were identified and quantified in section 8.1 of the 2017 EA. Continued operation of the new aboveground facilities would result in operational emissions of up to 11,798 tons (10,701 metric tons) per year of $CO_{2e}$."[41] The Draft EIS states that these estimates assume the Project is operated at maximum capacity 365 days per year, 24 hours a day.[42] The Draft EIS uses this same estimate in the executive summary,[43] and in the body of the document where it summarizes the Project's $CO_{2e}$ emissions.[44]

Only once does the document discuss the Project's ***actual*** $CO_{2e}$ emissions, where it states, "[i]n May 2020, Spire reported that its CO2e emissions for 2020 and 2021 were 2,817.4 and 1,365.5 tons, respectively."[45] Critically, comparing the Project's actual emissions in metric tons to the 2017 emissions (assuming 100% throughput 24 hours per day, 365 days per year) the actual emissions from 2020 were only 26% of the 2017 estimate, and the actual emissions from 2021 were only 13% of the 2017 estimate. Since the Commission's action here related to a project that is already in service, projections are unnecessary and the Commission should use the actual $CO_{2e}$ emissions data from 2020 and 2021 in the Final EIS.

[40] *See* Response of Spire STL Pipeline LLC to April 21, 2022 Environmental Information Request, Docket No. CP17-40-006 (May 2, 2022) ("Spire May EIR Response").
[41] Draft EIS at 4-23.
[42] *Id*.
[43] *Id*. at ES-4.
[44] *Id*. at 4-18.
[45] *Id*. (citing Spire May EIR Response). Moreover, these emissions should be described in metric tons, and not tons.

### *2. The Draft EIS Ignores the Reductions in GHG Emissions That Have Resulted from the Project, and That These Reductions Would Be Negated if the Project Were Removed from Service.*

The Draft EIS ignores the reductions in GHG emissions that resulted from the Project, and that these reductions would likely be undone if the Project were removed from service. Specifically, the Draft EIS ignores emissions reductions that resulted from Spire Missouri's retirement of its propane vaporization facilities, retirement of three compressor stations at Lange, and from its use of gas that was extracted with far lower GHG emissions. These benefits would be lost if the Spire STL Pipeline is removed from service.

In response to Spire STL's Request for Reissuance, Spire Missouri Inc. ("Spire Missouri") submitted a report from Trinity Consultants ("Trinity Report") that evaluated the environmental impacts of the Spire STL Pipeline.[46] The Trinity Report concludes that the Spire STL Pipeline results in a reduction of GHG emissions from several Spire Missouri facilities. Specifically, the Trinity Report explains that the Spire STL Pipeline allowed Spire Missouri to cease its previous reliance on propane.[47] Prior to addition of the Spire STL Pipeline, Spire Missouri used liquid propane peaking facilities, in which it injected liquid propane into storage and vaporized it as needed, when sufficient natural gas supplies were not available.[48] The Trinity Report finds that resumption of use of Spire Missouri's propane vaporization system would result in 16.8% more GHG emissions than natural gas combustion on an equivalent Btu basis.[49] This equates to 1,310 metric tons of $CO_{2e}$ per year.[50]

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[46] Spire Missouri Inc.'s Comments in Support of the Request of Spire STL Pipeline LLC for Expedited Reissuance of Certificates, Docket No. CP17-40-006, Att. D (Dec. 1, 2021) ("Spire Missouri Comments").
[47] *See, e.g.*, Trinity Report at 1.1, 4-1, 4-2.
[48] Spire Missouri Comments at 6.
[49] Trinity Report at 4-1.
[50] *Id*.

Spire STL also presented this information directly to Commission Staff in response to a data request that Commission Staff issued in preparing the Draft EIS. Spire STL explained that "the use of the liquid propane results in approximately 17% greater [GHG] emissions relative to the use of pipeline gas from the Spire STL Pipeline, among other relatively more harmful environmental impacts."[51]

The higher-pressure gas delivered by Spire STL has allowed Spire Missouri to reduce the use of compression at its Lange storage facility. As Spire STL informed the Commission, the Spire STL Pipeline has allowed Spire Missouri to retire three compressor stations at Lange, and that this resulted in an 80% reduction in GHG emissions from Lange.[52]

Furthermore, the Spire Missouri Comments explain that operation of the Spire STL Pipeline allows Spire Missouri to source gas from the Appalachian Basin, which is extracted and transported with lower GHG emissions than its other existing gas sources.[53] The Trinity Report explains that gas produced in the Appalachian Basin "has the lowest GHG intensity of the twenty largest-producing basins, and that this intensity is 22% of the average intensity across all basins."[54] The Spire STL Pipeline allows Spire Missouri to deliver this lower-emissions gas to its customers. In 2019, only 7.6% of Spire Missouri's gas was transported through pipelines that transported gas from the Appalachian Basin.[55] With the operation of the STL Pipeline, Spire Missouri now receives 55.1% of its gas from

[51] *See* Response of Spire STL Pipeline LLC to March 22, 2022 Environmental Information Request, Docket No. CP17-40-006, at 5 (Apr. 8, 2022).
[52] *See* Application of Spire STL Pipeline LLC for a Temporary Emergency Certificate, or, in the Alternative, Limited-Term Certificate, Ex. Z-1, Affidavit of Scott Carter, President of Spire Missouri Inc. ¶ 11, Docket No. CP17-40-007 (July 26, 2021).
[53] *See* Spire Missouri Comments, Affidavit of George Godat ¶ 34.
[54] Trinity Report at 5-1.
[55] *Id.*

the Appalachian Basin.[56] The Final EIS should reflect these benefits of continued operation of the Spire STL Pipeline.

The Draft EIS must also consider the GHG emissions impacts of adoption of the No-Action Alternative. The Draft EIS recognizes that if the Spire STL Pipeline is removed from service, Spire Missouri could reestablish the retired propane vaporization facilities, and that this would replace 15-17% of the Spire STL Pipeline capacity.[57] The Draft EIS recognizes that the Spire STL Pipeline allowed Spire Missouri to retire three compressor stations at Lange,[58] and that the Spire STL Pipeline provides Spire Missouri access to Appalachian gas supplies.[59]

Nonetheless, the Draft EIS fails to connect the dots. Each of these actions has resulted in reduced GHG emissions. Removal of the Spire STL Pipeline from service would eliminate these benefits. The Final EIS should acknowledge not only the GHG emissions benefits that Spire STL made possible, but that GHG emissions associated with Spire Missouri's operations would be likely to increase if the Spire STL Pipeline is removed from service.

[56] *Id.*
[57] Draft EIS at 3-11.
[58] *Id*. at ES-2, 1-4.
[59] *See id.* at 1-4.

## III. Conclusion

Spire STL respectively requests the Commission accept the Visual Screening Plan and these Comments.

Respectfully submitted,

*/s/ Paul Korman*

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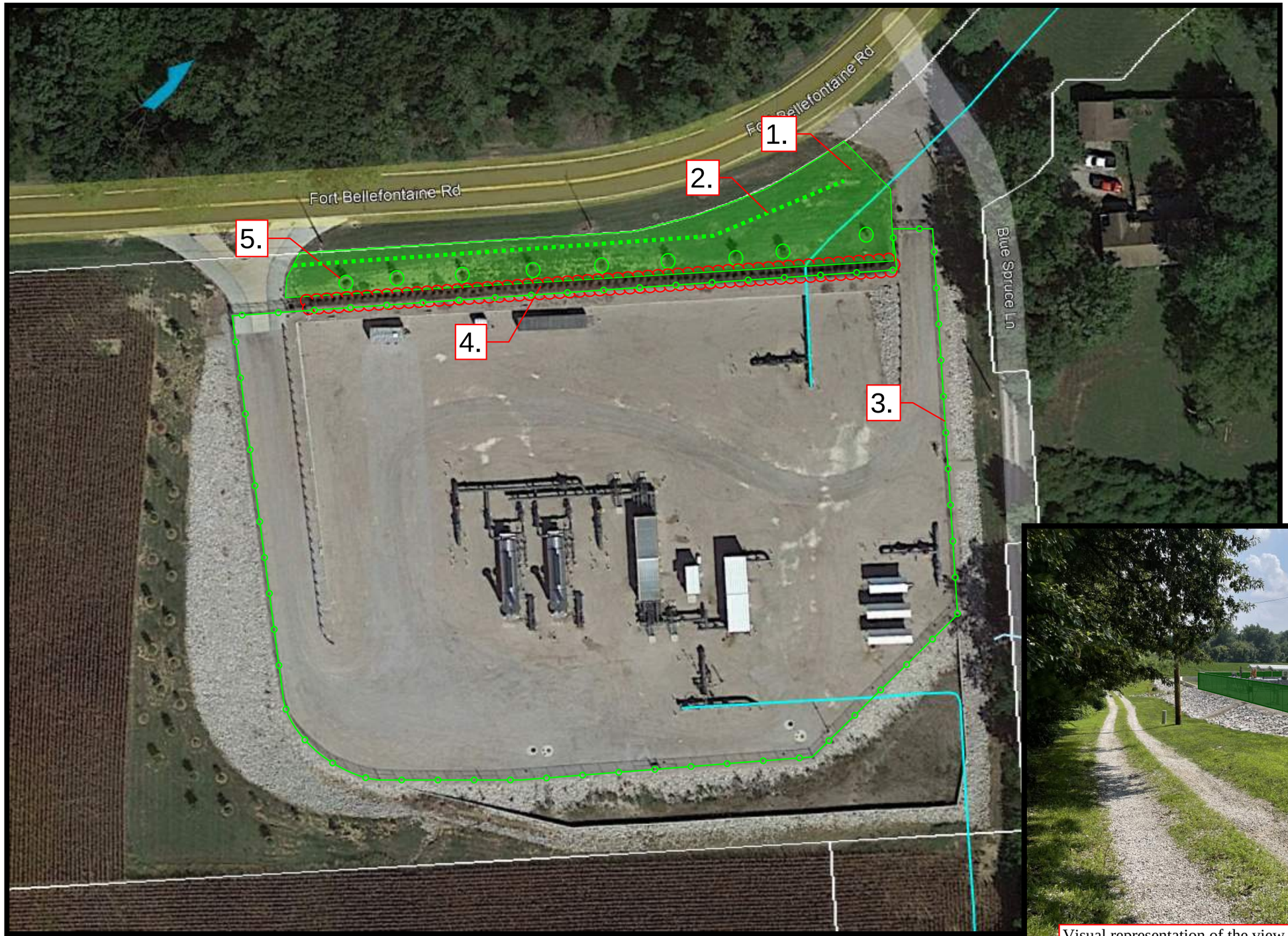
Dated: August 8, 2022

# APPENDIX A

## Visual Screening Plan




## Lange Station
## Visual Screening Plan

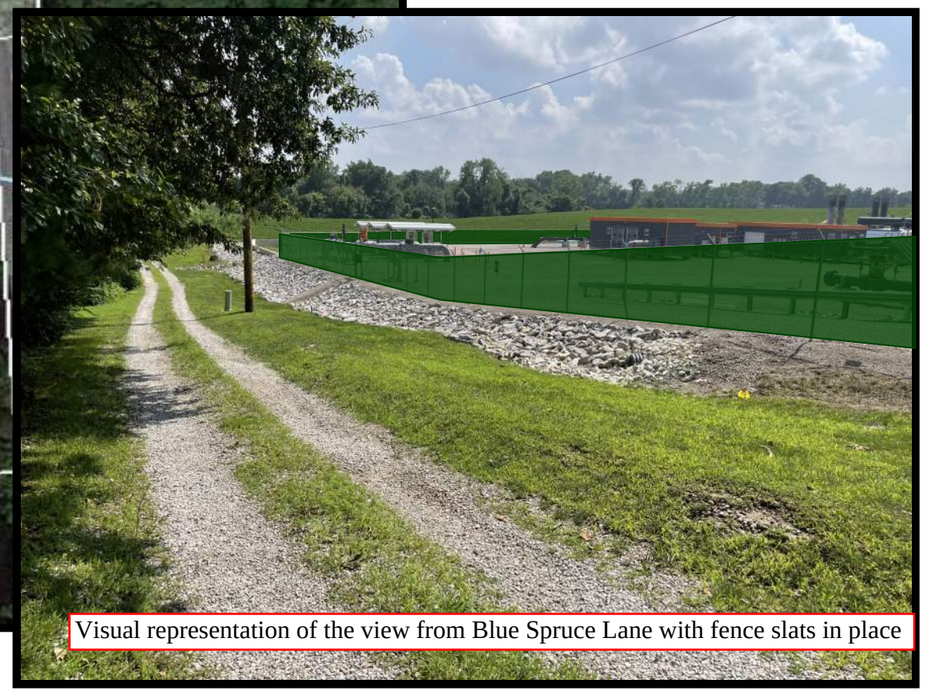
1. Replant upland area (shaded green) with native prairie grasses.

2. Plant additional landscaping bushes at the top of the slope.

3. Install 75% privacy slats on all chain link fence panels

4. Landscaping bushes planted along the fenceline in 2019 will continue to grow and obstruct the view of the facility through the fence.

5. Saplings planted in 2019 will continue to grow and provide additional visual obstruction of the facility over the fence.



Visual representation of the view from Blue Spruce Lane with fence slats in place

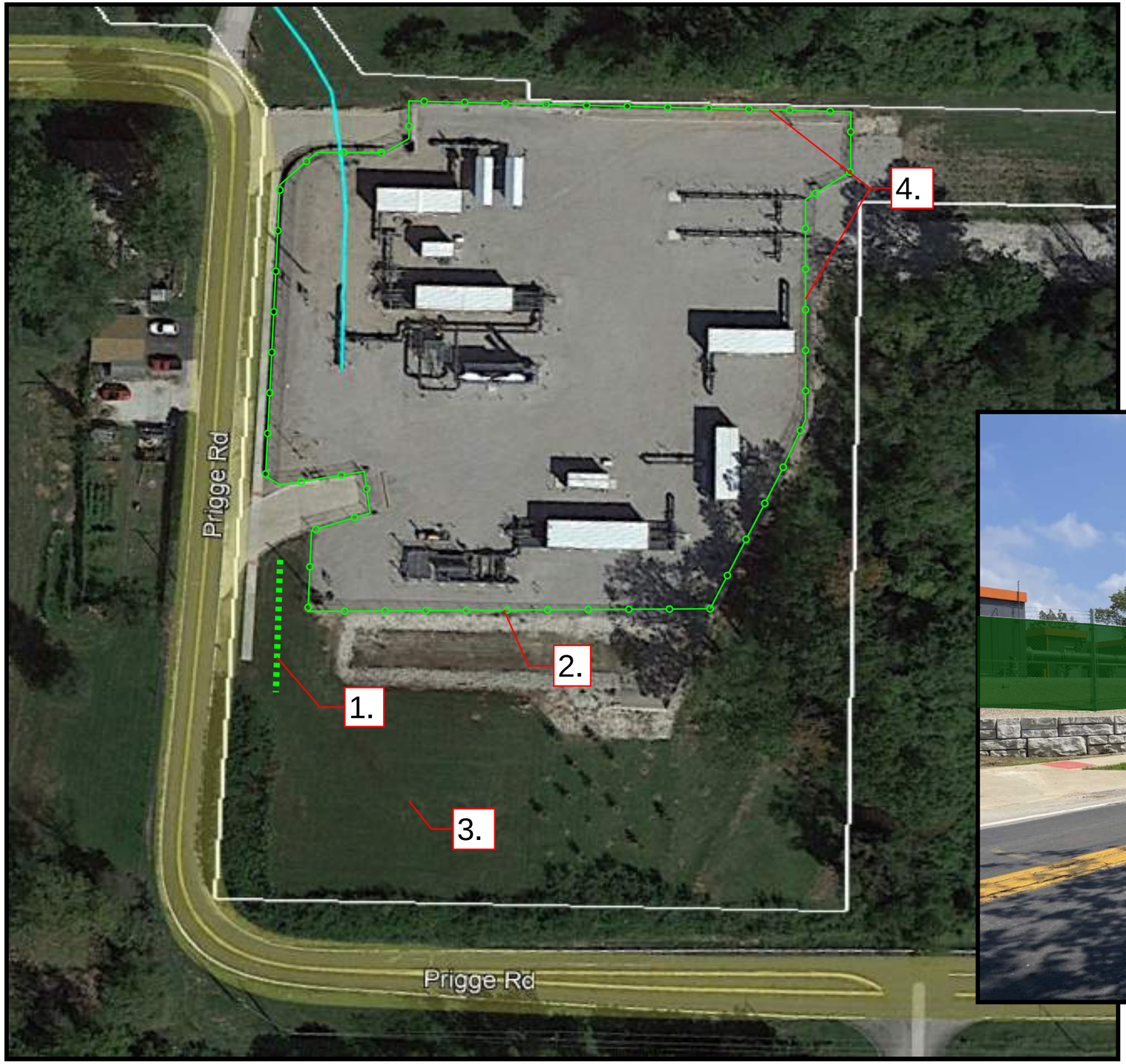
## Chain of Rocks Station
## Visual Screening Plan

1. Plant hedgerow type landscaping in the greenspace along the fenceline.

2. Install 75% privacy slats on all chain link fence panels

3. The field south of the facility is 15-20 feet higher than the adjacent road and currently obstructs the public's view.

4. The view of the north and east fence lines are currently obstructed by well established trees and brush.




Visual representation of the view from Prigge Road with fence slats in place.

**CERTIFICATE OF SERVICE**

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2022), I hereby certify that I have this 8th day of August 2022, served the forgoing documents on each person designated on the official service list compiled by the Secretary in this proceeding.

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