

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

In the Matter of an Investigation into	)	
City Utilities of Springfield Plastic Pipe	)	
Failures and the Adequacy of its Leak	)	<b><u>Case No. GS-2004-0257</u></b>
Survey Procedures, Installation	)	
Procedures and Replacement Criteria	)	

**STAFF RESPONSE TO ORDER DIRECTING FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission and files its Response pursuant to the Commission's *Order Directing Filing* ("Order") issued on November 30, 2018, and in support thereof states as follows:

1. The Order directed Staff to state, no later than December 14, 2018, whether this case can be closed.
2. City Utilities of Springfield's ("City Utilities") replacement program is still ongoing, and pipe is still being replaced. Therefore, this case should not be closed.
3. Staff has been and will continue to monitor the effectiveness of City Utilities' plastic main and service line replacement program and leak surveys. If at any time Staff determines that the program requirements should be enhanced, it will immediately bring its concerns and recommendations to the Commission.

**WHEREFORE**, Staff submits this Response to the Commission's November 30, 2018, *Order Directing Filing* and states that this case should not be closed.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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Attorney for the Staff of the  
Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 14th day of December, 2018.

**/s/ Jeffrey A. Keevil**