

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

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

**MOTION TO MODIFY EFFECTIVE DATE OF THE COMMISSION’S  
MARCH 3, 2021 ORDER AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), on behalf of its operating units, Spire Missouri East (“Spire East”) and Spire Missouri West (“Spire West”) and files this *Motion to Modify Effective Date of the Commission’s March 3, 2021 Order and Motion for Expedited Treatment*. In support of this filing, Spire Missouri respectfully states as follows:

1. On January 18, 2021, Spire Missouri filed a Motion to Modify the Commission’s December 2, 2020 Order to extend the waiver granted by this Commission pertaining to Rules 20 CSR 4240-40.030(9)(Q)1 as to atmospheric corrosion inspections (“ACI”) and 20 CSR 4240-40.030(13)(M) as to leak surveys from March 31, 2021 to October 31, 2021. The Company’s request for extension of the temporary waiver was to be applicable only to those customers who deny entry into their homes due to COVID-19. Spire Missouri requested an order with an effective date of April 1, 2021 in order to maintain compliance.

2. On March 3, 2021, the Commission issued an *Order Extending Temporary Waiver and Directing Notice*, granting Spire Missouri’s request for extension with certain

modifications and conditions. The waiver was extended from March 31, 2021 through July 31, 2021. The Order has an effective date of May 2, 2021.

3. As previously stated, the currently effective waiver approved by the Commission expires on March 31, 2021, and the extension granted by the Commission goes into effect on May 2, 2021. The May 2, 2021 effective date was issued by the Commission in order to accommodate PHMSA's notice requirement pursuant to 49 USC § 60118(d) that requires 60 days' notice to the U.S. Secretary of Transportation before the effective date of a state commission order approving a waiver of a federal requirement under federal gas and safety regulations under 49 CFR part 192.

4. The Commission's March 3, 2021 Order states "should PHMSA issue a letter indicating no objection to extension of the waiver period at any time before the May 2, 2021 effective date of this Order, the Commission encourages Staff and Spire to promptly file notice and seek relief as necessary." On March 23, 2021, PHMSA issued a Notice of Non-Objection to Spire Missouri's request for a waiver extension. In order to maintain compliance with Commission rules, a modification of the effective date of the order from May 2, 2021 to April 1, 2021 is required. Given that PHMSA has already issued its non-objection to the waiver request, Spire Missouri submits that the purposes behind the PHMSA notice requirement has been fulfilled, and a modified effective date is warranted. Similar to previous actions taken by the Commission in this case, Spire Missouri requests that the Commission modify the effective date to April 1, 2021, subject to the authority of the USDOT to issue a written objection and stay the waiver at any time before May 2, 2021.

MOTION FOR EXPEDITED TREATMENT

5. Given the impending deadlines for these inspections and replacements, the fact that absent an order with a April 1, 2021 effective date, Spire Missouri will not be able to maintain compliance with gas safety rules, along with issues regarding customer interaction during the COVID-19 pandemic, the Company submits that there is good cause to approve this application on an expedited basis and respectfully requests that the Commission issue an order modifying the effective date of the waiver extension so that it bears an effective date of April 1, 2021.

6. The Company believes the granting of this motion will slow the potential spread of COVID-19 and prevent the discontinuance of service to those customers who are concerned about COVID-19. The Company submits that there will be no negative impact on customers or the general public if the Commission grants such relief on an expedited basis. For all of these reasons, Spire Missouri submits that there is good cause for the Commission to approve its request.

7. This pleading was filed the same day the Company received notice of PHMSA's letter of non-objection.

**WHEREFORE**, Spire Missouri Inc. respectfully requests that the Commission approve the Company's *Motion to Modify Effective Date of Commission Order and Request for Expedited Treatment* consistent with the terms set forth herein.

Respectfully submitted,

/s/ Goldie T. Bockstruck

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**ATTORNEY FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25<sup>th</sup> day of March 2021.

/s/ Goldie T. Bockstruck