

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

In the Matter of an Investigation into)	
Spire Missouri Inc. d/b/a Spire's)	
Compliance with The Commission's)	<u>File No. GS-2022-0047</u>
Rules Regarding Natural Gas Safety)	
Found at 20 CSR 4240-40.030)	

PROGRESS REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, in response to the Commission's June 23, 2022 *Order Directing Additional Report*, and for its Progress Report states:

1. On August 24, 2021, Staff filed a motion requesting that the Commission open a case to investigate Spire Missouri d/b/a Spire's ("Spire Missouri") compliance with the Commission's rules regarding natural gas safety found at 20 CSR 4240-40.030.
2. On September 1, 2021, the Commission granted Staff's motion and ordered Staff to file a progress report regarding its investigation no later than February 28, 2022.
3. On February 28, 2022, Staff filed a progress report regarding its investigation and requesting additional time to complete its investigation. Staff's progress report requested a due date of no later than June 24, 2022 to file its report, or report on the progress of Staff's investigation.
4. On February 28, 2022, the Commission ordered Staff to file either a report regarding its investigation, or a report on the investigation's progress, no later than June 24, 2022.
5. On June 23, 2022, Staff filed a progress report regarding its investigation and requesting additional time to complete its investigation. Staff's progress report

requested a due date of no later than October 28, 2022 to file its report, or report on the progress of Staff's investigation.

6. On June 23, 2022, the Commission ordered Staff to file either a report regarding its investigation, or a report on the investigation's progress, no later than October 28, 2022.

7. Staff continues conducting discovery in this matter. Since Staff's progress report filed on June 23, 2022, Staff has submitted data requests (DRs) to Spire Missouri related to a) potential leaks on heat fusion joints completed by joiners with expired qualifications; b) Spire Missouri's actions taken in response to joiners with expired qualifications making plastic pipe heat fusion joints on Spire Missouri's pipelines; c) Spire Missouri's actions taken to prevent a recurrence of the issue(s) that resulted in plastic pipe heat fusion joints being completed by joiners with expired qualifications; d) information pertaining to any additional leaks on mechanical plastic pipe joints completed by joiners with expired qualifications; e) Spire Missouri's procedures in place when joiners completed plastic pipe joints after their qualifications expired; f) changes to Spire Missouri's Quality Assurance department; and g) field audit checks of operator qualification for employees and contractor employees. Staff continues to receive and review Spire Missouri's responses to DRs. Staff anticipates that following analysis of Spire Missouri's responses, further discovery may be required.

8. Since Staff's progress report filed June 23, 2022, Staff additionally performed one field inspection in the Spire Missouri East operating area and two field inspections in the Spire Missouri West operating area which included reviews of plastic pipe joiner qualification records as part of construction inspections. Staff's review of

plastic pipe joiner qualification records covered the specific individuals observed completing joints on Spire Missouri's facilities.

9. At Staff's request, a survey of other state pipeline safety programs was conducted to inquire if similar compliance issues have been identified by other states during their inspection of distribution systems under their respective jurisdictions, and corresponding corrective actions. Staff evaluated the results of this survey, and followed up with two of the state programs that indicated experience with similar compliance issues.

10. Staff requires additional time to complete its investigation and finalize its investigation report. Staff also anticipates the need for additional time due to Staff and Spire Missouri personnel availability during the holidays, and the press of other business. Staff will use this time to submit additional DRs, review Spire Missouri's responses, draft its report, submit its report to internal review, and receive and review Spire Missouri's identification of confidential information and feedback on the report's facts section. Additionally, Staff has scheduled field inspections including a) a standard records inspection in the Spire Missouri West operating area which will include a review of plastic pipe joiner qualification records; and b) two construction inspections, one each in the Spire Missouri East and Spire Missouri West operating areas, which could include the review of plastic pipe joiner qualification records for the joiners observed making joints on Spire Missouri's pipelines. Staff requests a due date of no later than April 28, 2023 to file its report, or a report on the progress of Staff's investigation.

WHEREFORE, for the above-stated reasons, Staff requests that the Commission order Staff to file a report regarding its investigation, or a report on the investigation's progress, no later than April 28, 2023.

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, or transmitted by facsimile or electronic mail to Spire Missouri, Inc., and The Office of the Public Counsel on this 27th day of October, 2022.

/s/Jamie S. Myers