

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

In the Matter of Spire Missouri Inc. d/b/a)
Spire Missouri West Concerning a)
Natural Gas Incident at 1106 Paseo Boulevard) **File No. GS-2019-_____**
In Kansas City, Missouri)

**STAFF’S MOTION TO ESTABLISH A CASE FOR
INVESTIGATION OF A GAS SAFETY INCIDENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission to establish a case for investigation of a gas safety incident, as follows:

1. The Missouri Public Service Commission has statutory responsibility to assure the health and safety of employees, customers, and the public served by natural gas corporations under Section 386.310 RSMo.

2. The cited section authorizes the Commission, after hearing or complaint, to order a utility to take appropriate steps to promote the safety of its employees, customers, and the general public.

3. Spire Missouri Inc. d/b/a Spire Missouri West is a “gas corporation” as defined in Section 386.020(18) RSMo and therefore subject to the jurisdiction of the Commission.

4. A reportable incident¹ occurred on Monday, July 16, 2018, in Kansas City, Missouri, an area served by Spire Missouri West (formerly known as the Missouri Gas Energy, or MGE, service area). Two workers sustained burn injuries and were transported to a hospital; one of the workers was admitted to the hospital and the other was treated and released.

¹ See 4 CSR 240-40.020(3) and (4).

5. Staff's initial investigation indicates that a contractor crew was working for Spire Missouri West at 1106 Paseo Boulevard when natural gas was released from a natural gas pipeline at approximately 10:20 a.m. A flash fire occurred, resulting in the injuries to the workers discussed above.

6. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Department.

7. Staff further recommends that the Commission direct that the report, or a status report, be filed within 180 days of the date on which the case is established.

WHEREFORE, Staff respectfully requests that the Commission establish a case for the purpose of receiving a report, or status report, as described herein.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 counsel of record this 19th day of July, 2018.

/s/ Jeffrey A. Keevil