

**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 Pipeline Incident Along)
Highway 169 in Kansas City, Missouri) **File No. GS-2021-XXXX**

**STAFF’S MOTION TO ESTABLISH A CASE FOR INVESTIGATION OF
A NATURAL GAS PIPELINE 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 natural gas pipeline 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 Wednesday, July 1, 2020, along Highway 169 in Kansas City, Missouri, an area served by Spire Missouri West. While working to install a guardrail along Hwy 169, a contractor damaged a 12-inch natural gas main owned and operated by Spire Missouri West.

¹ See 20 CSR 4240-40.020(3) and (4).

5. Staff's initial investigation indicates that the contractor had submitted a request for utilities to be located in the area on May 28, 2020, however the Spire facilities were not marked.

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/ Robert S. Berlin

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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 21st day of July, 2020.

/s/ Robert S. Berlin