BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Spire Missouri) Inc. d/b/a Spire Missouri West Concerning to Natural Gas Incident at 1106 Paseo Boulevard in Kansas City, Missouri

Case No. GS-2019-0015

SPIRE MISSOURI'S MOTION FOR ADDITIONAL TIME TO RESPOND TO STAFF'S GAS INCIDENT REPORT

COMES NOW, Spire Missouri Inc., d/b/a Spire Missouri West ("Spire Missouri"), and hereby submits this Motion for Additional Time to Respond to Staff's Gas Incident Report, and in support thereof, respectfully states as follows:

1. On July 31, 2019 the Missouri Public Service Commission Staff ("Staff") filed its Gas Incident Report regarding its investigation of the July 16, 2018 Natural Gas Incident at 1106 The Paseo. Staff's report identified violations of the Missouri Public Service Commission's ("Commission") gas pipeline safety rules and included recommendations to ultimately improve Spire Missouri's gas safety procedures.

2. On August 1, 2019, the Commission issued its Order Directing Spire Missouri *Respond to Staff's Gas Incident Report* by no later than August 30, 2019.

3. Spire Missouri and Staff have been engaged in discussions to resolve the concerns raised in Staff's report and are actively working on a stipulation and agreement. In order to fully address the recommendations included in Staff's Report, and work towards an agreement resolving all issues raised in Staff's Report, Spire Missouri requests an additional 30 days, by September 30, 2019 to file a stipulation and agreement. Assuming the settlement is completed, the stipulation and agreement will be filed in lieu of a response. Counsel for Staff has been contacted and has indicated they do not object to this Motion.

WHEREFORE, Spire Missouri requests that the Missouri Public Service Commission issue an order granting this *Motion for Additional Time to Respond to Staff's Gas Incident Report* and giving Spire Missouri until September 30, 2019 to either file a Stipulation and Agreement or respond to Staff's Gas Incident Report.

Respectfully Submitted,

Is/Goldie T. Bockstruck

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Motion for Additional Time was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of the Public Counsel this 30th day of August 2019 by hand-delivery, fax, electronic or regular mail.

Isl Goldie T. Bockstruck