

**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                    )  
Rules Regarding Natural Gas Safety                    )  
Found at 20 CSR 4240-40.030                            )  
**File No. GS-2022-0047**

**PROGRESS REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, in response to the Commission's February 28, 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's 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. Staff continues conducting discovery in this matter. Since Staff's progress report filed February 28, 2022, Staff has submitted data requests (DRs) to Spire related to a) Spire's process for tracking the qualification status of plastic pipe joiners;

b) Spire's use of operator qualification software; c) Spire's processes for verifying the qualification of individuals completing plastic pipe joints on Spire's pipelines; d) Spire's use of the ASME B31Q standard for establishing requalification intervals in its operator qualification software; e) Spire's process for tracking joints found unacceptable under 20 CSR 4240-40.030(10); f) leaks on mechanical joints completed on Spire's pipelines after the joiner's qualifications had lapsed; g) the initial qualification dates of joiners whose qualifications lapsed; h) training and qualification procedures related to each type of mechanical fitting used by Spire; i) training material used by Spire during the training and qualification process for plastic pipe joining; j) Spire's leak cause determination process; and k) confirmation that information in Spire's July 2, 2021 email is current. Staff continues to receive and review Spire's responses to DRs. Staff anticipates that following analysis of Spire's responses, further discovery may be required.

6. Since Staff's progress report filed February 28, 2022, Staff additionally performed a field inspection including review of plastic pipe joiner qualification records in the Spire Missouri East operating area as part of a standard records inspection. Staff's review of plastic pipe joiner qualification records covered the requalification periods between 2020 and 2021, and 2021 through the end of March 2022.

7. 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 has received and is evaluating the results of this survey.

8. Due to the potential applicability of federal pipeline safety standards in 49 CFR 192, Staff has discussed possible actions to take moving forward with a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA).

9. Staff requires additional time to complete its investigation and finalize its investigation report. Staff will use this time to submit additional DRs, review Spire's responses, review survey responses from other state programs, draft its report, submit its report to internal review, and receive and review Spire's identification of confidential information and feedback on the report's facts section. Staff requests a due date of no later than October 28, 2022 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 October 28, 2022.

Respectfully submitted,

**/s/ Jamie S. Myers**

Jamie S. Myers  
Deputy Counsel  
Missouri Bar No. 68291  
Attorney for the Staff of the  
Missouri Public Service  
Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-526-6036 (Voice)  
573-751-9285 (Fax)  
[jamie.myers@psc.mo.gov](mailto:jamie.myers@psc.mo.gov)

**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 23<sup>rd</sup> day of June, 2022.

**/s/ Jamie S. Myers**

*/s/*