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)	File No. GS-2019-0015
Gas Incident at 1106 Paseo Boulevard)	
In Kansas City, Missouri)	

STAFF'S MOTION FOR ADDITIONAL TIME TO FILE STAFF INCIDENT REPORT TO JULY 31, 2019

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through Staff Counsel's Office, and hereby submits Staff's Motion For Additional Time To File Staff Incident Report of its investigation into the July 16, 2018 gas incident at 1106 The Paseo Boulevard in Kansas City, Missouri and moves the Commission to extend the filing date for the Staff Report to July 31, 2019, from June 25, 2019. In support of Staff's request, the Staff states as follows:

- 1. On Monday, July 16, 2018, in Kansas City, Missouri, an area served by Spire Missouri Inc. d/b/a Spire Missouri West (formerly known as "Missouri Gas Energy" or "MGE"), a reportable gas incident occurred
- 2. Staff filed a Motion on July 19, 2018, in the instant case requesting that the Commission open a file for (a) a Staff investigation by the Safety Engineering Department of the incident at 1106 The Paseo Boulevard and (b) receipt of a Staff Report, or a Staff Status Report prior to a Staff Report. Regarding timing, Staff recommended that the Commission direct Staff to file a Report or a Status Report within 180 days of the date on which the file for the investigation is established.

¹ See 4 CSR 240-40.020(3) and (4).

- 3. On July 25, 2018, the Commission issued an Order Opening File And Directing Filing in which it ordered Staff to file a Report regarding the incident or a Status Report on its investigation no later than January 21, 2019. On January 18, 2019, Staff filed a Status Report And Motion For Additional Time to June 25, 2019 to file its gas incident Report. On January 22, 2019, the Commission issued an Order Granting Request For Additional Time To File A Report to June 25, 2019.
- 4. Along with its work on other gas safety cases and gas safety inspection activities, Staff gas safety personnel have worked diligently on this investigation which it requested the Commission to authorize. Regardless of its effort to meet the June 25 filing date Staff requested the Commission to set, Staff needs additional time.
- 5. Staff sent to Spire on June 13, 2019, Staff's write-up of that portion of the Staff's gas incident Report that constitutes Staff's identification of the facts of the gas incident at 1106 The Paseo on July 16, 2018. Staff requested in its transmittal messages that Spire should indicate corrections it believes appropriate to Staff's write-up of the facts, and Staff would consider what Spire provides. Also certain material/information in the write-up which Staff submitted to Spire was marked "Confidential" pursuant to what Spire had indicated was "Confidential" in responses to Staff Data Requests, among other things. Staff asked in the transmittal messages that Spire verify that Staff had appropriately identified the material/information that should be designated "Confidential" pursuant to the Commission Rule, 4 CSR 240-2.135. Staff requested that Spire submit the results of its review back to Staff by June 28, 2019.
- 6. Pending receiving from Spire the results of its review of Staff's write-up of the factual portion of Staff's gas incident Report, and thereafter through July, Staff will be

engaged in completing its writing of Staff's Report. Part of July will also be utilized to review, and address, if necessary, any reply from Spire regarding the factual portion of Staff's gas incident Report and the treatment of material/information as "Confidential." If Staff finds it can file its Report earlier than July 31, 2019, Staff will do so.

WHEREFORE, Staff hereby requests that the Commission issue an Order granting Staff an extension of the filing date for the Staff Report respecting the gas incident at 1106 The Paseo Boulevard to July 31, 2019 from June 25, 2019.

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on Counsel for the Parties of record to this case, on this 20th day of June 2019.

/s/ Steven Dottheim