

Missouri Public Service Commission

Respond Data Request

| | |
|--------------------------|--|
| Data Request No. | 0013 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | cast iron mains |
| Description | 1. Does the Missouri Public Service Commission's Gas Safety Department ("MoPSC Gas Safety Department") agree that all of the cast iron mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition? a. Please explain the answer and provide all documents in Staff's possession that supports its answer. |
| Response | The Safety Engineering Staff does not agree that all of the cast iron mains currently in service are in a "worn out" or "deteriorated condition", because the Missouri Public Service Commission's Pipeline Safety Rules do not include definitions of when natural gas piping is considered to be "worn out" or in a "deteriorated condition". Because the terms "worn out" and in a "deteriorated condition" are not defined in the Missouri Public Service Commission's Pipeline Safety Rules, consideration of pipe condition using these classifications does not fall within the scope of Safety Engineering Staff duties. The Commission's Pipeline Safety Rules addressing the requirements for replacement of cast iron mains are found in 20 CSR 4240-40.030(15)(D). Additionally, the Commission's Pipeline Safety Rules restrict the use of materials other than steel or polyethylene for the underground construction of pipelines as specified in 20 CSR 4240-40.030 (2)(B). Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2019-0356** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession

Schedule JAR-D-16

of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security : Public
Rationale : NA

Missouri Public Service Commission

Respond Data Request

| | |
|--------------------------|---|
| Data Request No. | 0014 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Gas Safety Department |
| Description | 2. Does the Gas Safety Department agree that all of the non-cathodically protected steel mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition? a. Please explain the answer and provide all documents in Staff's possession that supports its answer. |
| Response | According to annual reports submitted by Spire, Spire has no remaining non-cathodically protected steel mains currently in service in Spire's Missouri service territories. Please see attached confidential annual reports. Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2019-0356** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.

| | |
|--------------------|--------|
| Security : | Public |
| Rationale : | NA |

Schedule JAR-D-16

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 10/31/2021



U.S Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Initial Date Submitted:

03/15/2019

Form Type:

INITIAL

Date Submitted:

**ANNUAL REPORT FOR
CALENDAR YEAR 2018
GAS DISTRIBUTION SYSTEM**

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipeline/library/forms>.

PART A - OPERATOR INFORMATION

(DOT use only)

20190942-38392

| | |
|---|--------------------------|
| 1. Name of Operator | SPIRE MISSOURI INC. EAST |
| 2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED) | |
| 2a. Street Address | 700 MARKET |
| 2b. City and County | SAINT LOUIS |
| 2c. State | MO |
| 2d. Zip Code | 63101 |
| 3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER | 11032 |
| 4. HEADQUARTERS NAME & ADDRESS | |
| 4a. Street Address | 700 MARKET STREET |
| 4b. City and County | SAINT LOUIS |
| 4c. State | MO |
| 4d. Zip Code | 63101 |
| 5. STATE IN WHICH SYSTEM OPERATES | MO |
| 6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.) | |
| Natural Gas | |
| 7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.): | |
| Investor Owned | |

PART B - SYSTEM DESCRIPTION

1.GENERAL

| | STEEL | | | | PLASTIC | CAST/ WROUGHT IRON | DUCTILE IRON | COPPER | OTHER | RECONDITION ED CAST IRON | SYSTEM TOTAL |
|--------------------|-------------|--------|---------------------------|---------|----------|--------------------------|-----------------|--------|-------|--------------------------------|-----------------|
| | UNPROTECTED | | CATHODICALLY PROTECTED | | | | | | | | |
| | BARE | COATED | BARE | COATED | | | | | | | |
| MILES OF MAIN | | | 25 | 4007.96 | 4214.589 | 477.051 | 0 | 0.37 | 0 | 0 | 8724.97 |
| NO. OF SERVICES | 2839 | | | 103757 | 459674 | 0 | 0 | 55482 | 0 | 0 | 621752 |

| 2.MILES OF MAINS IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
|--|---------|------------|-----------------|-----------------|------------------------------|-----------|---------------|-----------|-----------|-----------|-------|
| MATERIAL | UNKNOWN | 2" OR LESS | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" THRU 12" | OVER 12" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 2520.715 | 522.004 | 895.414 | 78.386 | 16.443 | 4032.962 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | .370 | 0 | 0 | 0 | 0 | .37 | | | | |
| CAST/WROUGHT IRON | 0 | | 134.885 | 195.237 | 100.904 | 46.025 | 477.051 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 3091.605 | 822.442 | 284.507 | 16.035 | 0 | 4214.589 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 5612.69 | 1479.331 | 1375.158 | 195.325 | 62.468 | 8724.972 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
| | | | | | AVERAGE SERVICE LENGTH: 65.9 | | | | | | |
| MATERIAL | UNKNOWN | 1" OR LESS | OVER 1" THRU 2" | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 96138 | 9624 | 761 | 72 | 1 | 106596 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | 55338 | 144 | 0 | 0 | 0 | 55482 | | | | |
| CAST/WROUGHT IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 443874 | 15227 | 511 | 23 | 39 | 459674 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 595350 | 24995 | 1272 | 95 | 40 | 621752 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION | | | | | | | | | | | |
| | UNKNOWN | PRE-1940 | 1940-1949 | 1950-1959 | 1960-1969 | 1970-1979 | 1980-1989 | 1990-1999 | 2000-2009 | 2010-2019 | TOTAL |

| | | | | | | | | | | | |
|---------------------------|--------|---------|---------|----------|----------|----------|---------|----------|---------|---------|----------|
| MILES OF MAIN | 32.705 | 526.581 | 106.471 | 1066.250 | 1866.848 | 1223.887 | 952.731 | 1374.507 | 873.919 | 701.078 | 8724.977 |
| NUMBER OF SERVICES | 0 | 5288 | 4304 | 66058 | 69301 | 90686 | 78571 | 103815 | 131667 | 72062 | 621752 |

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

| CAUSE OF LEAK | MAINS | | SERVICES | |
|-----------------------------|-------|-----------|----------|-----------|
| | TOTAL | HAZARDOUS | TOTAL | HAZARDOUS |
| CORROSION FAILURE | 97 | 12 | 236 | 68 |
| NATURAL FORCE DAMAGE | 71 | 13 | 361 | 71 |
| EXCAVATION DAMAGE | 143 | 136 | 652 | 645 |
| OTHER OUTSIDE FORCE DAMAGE | 23 | 15 | 186 | 91 |
| PIPE, WELD OR JOINT FAILURE | 333 | 38 | 762 | 147 |
| EQUIPMENT FAILURE | 56 | 6 | 695 | 106 |
| INCORRECT OPERATIONS | 6 | 0 | 12 | 6 |
| OTHER CAUSE | 198 | 14 | 660 | 92 |

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 1959

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 860

- a. One-Call Notification Practices Not Sufficient: 86
- b. Locating Practices Not Sufficient: 352
- c. Excavation Practices Not Sufficient: 301
- d. Other: 121

2. NUMBER OF EXCAVATION TICKETS : 246956

PART E - EXCESS FLOW VALUE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 11279

Estimated Number Of Services with EFV In the System At End Of Year: 78074

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 955

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 1779

**These questions only pertain to reporting years 2017 & beyond.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: 4%

PART H - ADDITIONAL INFORMATION

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|--|--|
| | |
|--|--|

PART I - PREPARER

| | |
|---|--|
| | |
| Erin Milkert, Operator (Preparer's Name and Title) | (314)349-2932 _____ (Area Code and Telephone Number) |
| | |
| erin.milkert@thelacledgroup.com (Preparer's email address) | _____ (Area Code and Facsimile Number) |

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 1/31/2018



U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Initial Date Submitted:

03/15/2018

Form Type:

INITIAL

Date Submitted:

**ANNUAL REPORT FOR
CALENDAR YEAR 2017
GAS DISTRIBUTION SYSTEM**

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PART A - OPERATOR INFORMATION

(DOT use only)

20188739-35889

| | |
|---|--------------------------|
| 1. Name of Operator | SPIRE MISSOURI INC. EAST |
| 2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED) | |
| 2a. Street Address | 700 MARKET |
| 2b. City and County | SAINT LOUIS |
| 2c. State | MO |
| 2d. Zip Code | 63101 |
| 3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER | 11032 |
| 4. HEADQUARTERS NAME & ADDRESS | |
| 4a. Street Address | 700 MARKET STREET |
| 4b. City and County | SAINT LOUIS |
| 4c. State | MO |
| 4d. Zip Code | 63101 |
| 5. STATE IN WHICH SYSTEM OPERATES | MO |
| 6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.) | |
| Natural Gas | |
| 7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.): | |
| Investor Owned | |

PART B - SYSTEM DESCRIPTION

1.GENERAL

| | STEEL | | | | PLASTIC | CAST/ WROUGHT IRON | DUCTILE IRON | COPPER | OTHER | RECONDITION ED CAST IRON | SYSTEM TOTAL |
|-----------------|-------------|--------|---------------------------|---------|---------|--------------------------|-----------------|--------|-------|--------------------------------|-----------------|
| | UNPROTECTED | | CATHODICALLY PROTECTED | | | | | | | | |
| | BARE | COATED | BARE | COATED | | | | | | | |
| MILES OF MAIN | | | 25 | 4014.47 | 4112.66 | 531.46 | | .41 | | | 8684 |
| NO. OF SERVICES | 4163 | | | 105333 | 453181 | | | 58075 | | | 620752 |

| 2.MILES OF MAINS IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
|--|---------|------------|-----------------|-----------------|------------------------------|-----------|---------------|-----------|-----------|-----------|-------|
| MATERIAL | UNKNOWN | 2" OR LESS | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" THRU 12" | OVER 12" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 2525.97 | 524.34 | 893.10 | 78.82 | 17.24 | 4039.47 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | .41 | 0 | 0 | 0 | 0 | .41 | | | | |
| CAST/WROUGHT IRON | 0 | 0 | 153.37 | 220.74 | 107.92 | 49.43 | 531.46 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 3024.87 | 802.41 | 270.36 | 15.02 | 0 | 4112.66 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 5551.25 | 1480.12 | 1384.2 | 201.76 | 66.67 | 8684 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
| | | | | | AVERAGE SERVICE LENGTH: 65.7 | | | | | | |
| MATERIAL | UNKNOWN | 1" OR LESS | OVER 1" THRU 2" | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 97127 | 11455 | 823 | 77 | 1 | 109483 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | 57902 | 173 | 0 | 0 | 0 | 58075 | | | | |
| CAST/WROUGHT IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 437868 | 14741 | 514 | 19 | 39 | 453181 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 592897 | 26369 | 1337 | 96 | 40 | 620739 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION | | | | | | | | | | | |
| | UNKNOWN | PRE-1940 | 1940-1949 | 1950-1959 | 1960-1969 | 1970-1979 | 1980-1989 | 1990-1999 | 2000-2009 | 2010-2019 | TOTAL |

| | | | | | | | | | | | |
|---------------------------|-------|--------|--------|---------|---------|---------|--------|---------|--------|--------|--------|
| MILES OF MAIN | 30.00 | 577.11 | 107.39 | 1071.78 | 1872.38 | 1226.66 | 955.48 | 1377.42 | 876.43 | 589.35 | 8684 |
| NUMBER OF SERVICES | 0 | 6471 | 4662 | 67304 | 71509 | 92586 | 79724 | 104634 | 132288 | 61574 | 620752 |

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

| CAUSE OF LEAK | MAINS | | SERVICES | |
|-----------------------------|-------|-----------|----------|-----------|
| | TOTAL | HAZARDOUS | TOTAL | HAZARDOUS |
| CORROSION FAILURE | 96 | 8 | 244 | 83 |
| NATURAL FORCE DAMAGE | 28 | 4 | 67 | 13 |
| EXCAVATION DAMAGE | 142 | 128 | 774 | 751 |
| OTHER OUTSIDE FORCE DAMAGE | 17 | 9 | 66 | 43 |
| PIPE, WELD OR JOINT FAILURE | 364 | 17 | 779 | 163 |
| EQUIPMENT FAILURE | 70 | 3 | 538 | 73 |
| INCORRECT OPERATIONS | 0 | 0 | 1 | 1 |
| OTHER CAUSE | 311 | 4 | 682 | 89 |

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 2233

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 833

- a. One-Call Notification Practices Not Sufficient: 110
- b. Locating Practices Not Sufficient: 391
- c. Excavation Practices Not Sufficient: 317
- d. Other: 15

2. NUMBER OF EXCAVATION TICKETS : 261317

PART E - EXCESS FLOW VALVE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 10491

Estimated Number Of Services with EFV In the System At End Of Year: 66795

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 824

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 824

**These questions only pertain to reporting years 2017 & beyond.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL INPUT FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

INPUT FOR YEAR ENDING 6/30: 2.7%

PART H - ADDITIONAL INFORMATION

PART I - PREPARER

| | |
|---|---|
| | |
| Nicole Christianer, Manager, Pipeline Safety (Preparer's Name and Title) | (314) 349-2929 _____ (Area Code and Telephone Number) |
| | |
| nicole.christianer@spireenergy.com (Preparer's email address) | _____ (Area Code and Facsimile Number) |

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 10/31/2021



U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Initial Date Submitted:

03/15/2019

Form Type:

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Date Submitted:

**ANNUAL REPORT FOR
CALENDAR YEAR 2018
GAS DISTRIBUTION SYSTEM**

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PART A - OPERATOR INFORMATION

(DOT use only)

20190953-38403

| | |
|---|--------------------------|
| 1. Name of Operator | SPIRE MISSOURI INC. WEST |
| 2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED) | |
| 2a. Street Address | 700 MARKET |
| 2b. City and County | SAINT LOUIS |
| 2c. State | MO |
| 2d. Zip Code | 63101 |
| 3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER | 30769 |
| 4. HEADQUARTERS NAME & ADDRESS | |
| 4a. Street Address | 700 MARKET STREET |
| 4b. City and County | SAINT LOUIS |
| 4c. State | MO |
| 4d. Zip Code | 63101 |
| 5. STATE IN WHICH SYSTEM OPERATES | MO |
| 6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.) | |
| Natural Gas | |
| 7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.): | |
| Investor Owned | |

PART B - SYSTEM DESCRIPTION

1.GENERAL

| | STEEL | | | | PLASTIC | CAST/ WROUGHT IRON | DUCTILE IRON | COPPER | OTHER | RECONDITION ED CAST IRON | SYSTEM TOTAL |
|-----------------|-------------|--------|---------------------------|----------|----------|--------------------------|-----------------|--------|-------|--------------------------------|-----------------|
| | UNPROTECTED | | CATHODICALLY PROTECTED | | | | | | | | |
| | BARE | COATED | BARE | COATED | | | | | | | |
| MILES OF MAIN | | | 847.485 | 3434.827 | 4330.124 | 241.012 | 0 | 0 | 0 | 0 | 8853.448 |
| NO. OF SERVICES | 704 | 2043 | 6535 | 22264 | 479610 | 0 | 0 | 0 | 0 | 0 | 511156 |

| 2.MILES OF MAINS IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
|--|---------|------------|-----------------|-----------------|------------------------------|-----------|---------------|-----------|-----------|-----------|-------|
| MATERIAL | UNKNOWN | 2" OR LESS | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" THRU 12" | OVER 12" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 1715.451 | 1427.400 | 797.905 | 214.958 | 126.598 | 4282.312 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| CAST/WROUGHT IRON | 0 | 0 | 73.085 | 120.768 | 33.560 | 13.599 | 241.012 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 2636.340 | 1408.938 | 263.346 | 17.346 | 4.154 | 4330.124 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 4351.791 | 2909.423 | 1182.019 | 265.864 | 144.351 | 8853.448 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
| | | | | | AVERAGE SERVICE LENGTH: 57.6 | | | | | | |
| MATERIAL | UNKNOWN | 1" OR LESS | OVER 1" THRU 2" | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 20663 | 10560 | 269 | 46 | 8 | 31546 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| CAST/WROUGHT IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 457528 | 21806 | 251 | 24 | 1 | 479610 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 478191 | 32366 | 520 | 70 | 9 | 511156 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION | | | | | | | | | | | |
| | UNKNOWN | PRE-1940 | 1940-1949 | 1950-1959 | 1960-1969 | 1970-1979 | 1980-1989 | 1990-1999 | 2000-2009 | 2010-2019 | TOTAL |

| | | | | | | | | | | | |
|---------------------------|-------|---------|---------|---------|----------|----------|---------|----------|----------|---------|----------|
| MILES OF MAIN | 4.659 | 855.331 | 139.878 | 791.246 | 1663.627 | 1041.179 | 928.213 | 1311.917 | 1148.244 | 969.163 | 8853.457 |
| NUMBER OF SERVICES | 0 | 1934 | 392 | 4916 | 13029 | 47263 | 96429 | 215823 | 88300 | 43070 | 511156 |

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

| CAUSE OF LEAK | MAINS | | SERVICES | |
|-----------------------------|-------|-----------|----------|-----------|
| | TOTAL | HAZARDOUS | TOTAL | HAZARDOUS |
| CORROSION FAILURE | 93 | 18 | 14 | 6 |
| NATURAL FORCE DAMAGE | 77 | 28 | 104 | 53 |
| EXCAVATION DAMAGE | 177 | 176 | 663 | 659 |
| OTHER OUTSIDE FORCE DAMAGE | 9 | 8 | 110 | 107 |
| PIPE, WELD OR JOINT FAILURE | 125 | 28 | 190 | 62 |
| EQUIPMENT FAILURE | 8 | 3 | 3 | 1 |
| INCORRECT OPERATIONS | 5 | 2 | 19 | 18 |
| OTHER CAUSE | 44 | 2 | 23 | 11 |

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 698

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 870

- a. One-Call Notification Practices Not Sufficient: 140
- b. Locating Practices Not Sufficient: 286
- c. Excavation Practices Not Sufficient: 288
- d. Other: 156

2. NUMBER OF EXCAVATION TICKETS : 257524

PART E - EXCESS FLOW VALUE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 17314

Estimated Number Of Services with EFV In the System At End Of Year: 76775

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 465

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 575

**These questions only pertain to reporting years 2017 & beyond.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: 1.75%

PART H - ADDITIONAL INFORMATION

| | |
|--|--|
| | |
|--|--|

PART I - PREPARER

| | |
|--|--|
| | |
|--|--|

| | |
|---|--|
| Erin Milkert, Operator (Preparer's Name and Title) | (314)349-2932 _____ (Area Code and Telephone Number) |
|---|--|

| | |
|--|--|
| | |
|--|--|

| | |
|---|---|
| erin.milkert@thelacledgroup.com (Preparer's email address) | _____ (Area Code and Facsimile Number) |
|---|---|

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 1/31/2018



U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Initial Date Submitted:

03/15/2018

Form Type:

INITIAL

Date Submitted:

**ANNUAL REPORT FOR
CALENDAR YEAR 2017
GAS DISTRIBUTION SYSTEM**

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipeline/library/forms>.

PART A - OPERATOR INFORMATION

(DOT use only)

20188740-35890

| | |
|---|--------------------------|
| 1. Name of Operator | SPIRE MISSOURI INC. WEST |
| 2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED) | |
| 2a. Street Address | 700 MARKET |
| 2b. City and County | SAINT LOUIS |
| 2c. State | MO |
| 2d. Zip Code | 63101 |
| 3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER | 30769 |
| 4. HEADQUARTERS NAME & ADDRESS | |
| 4a. Street Address | 700 MARKET STREET |
| 4b. City and County | SAINT LOUIS |
| 4c. State | MO |
| 4d. Zip Code | 63101 |
| 5. STATE IN WHICH SYSTEM OPERATES | MO |
| 6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.) | |
| Natural Gas | |
| 7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.): | |
| Investor Owned | |

PART B - SYSTEM DESCRIPTION

1. GENERAL

| | STEEL | | | | PLASTIC | CAST/ WROUGHT IRON | DUCTILE IRON | COPPER | OTHER | RECONDITION ED CAST IRON | SYSTEM TOTAL |
|--------------------|-------------|--------|---------------------------|---------|---------|--------------------------|-----------------|--------|-------|--------------------------------|-----------------|
| | UNPROTECTED | | CATHODICALLY PROTECTED | | | | | | | | |
| | BARE | COATED | BARE | COATED | | | | | | | |
| MILES OF MAIN | | | 930.21 | 3471.56 | 4076.69 | 264.96 | | | | | 8743.42 |
| NO. OF SERVICES | 1417 | 3746 | 6811 | 21929 | 473736 | | | 487 | | | 508126 |

| 2.MILES OF MAINS IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
|--|---------|------------|-----------------|-----------------|-------------------------------|-----------|---------------|-----------|-----------|-----------|-------|
| MATERIAL | UNKNOWN | 2" OR LESS | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" THRU 12" | OVER 12" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 1778.92 | 1478.99 | 801.49 | 215.85 | 126.52 | 4401.77 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| CAST/WROUGHT IRON | 0 | 0 | 77.77 | 136.51 | 36.61 | 14.07 | 264.96 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 2491.41 | 1340.77 | 231.88 | 8.48 | 4.15 | 4076.69 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 4270.33 | 2897.53 | 1169.88 | 260.94 | 144.74 | 8743.42 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR | | | | | | | | | | | |
| | | | | | AVERAGE SERVICE LENGTH: 74.38 | | | | | | |
| MATERIAL | UNKNOWN | 1" OR LESS | OVER 1" THRU 2" | OVER 2" THRU 4" | OVER 4" THRU 8" | OVER 8" | SYSTEM TOTALS | | | | |
| STEEL | 0 | 20125 | 13392 | 327 | 51 | 8 | 33903 | | | | |
| DUCTILE IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| COPPER | 0 | 194 | 293 | 0 | 0 | 0 | 487 | | | | |
| CAST/WROUGHT IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PVC | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC PE | 0 | 451689 | 21795 | 235 | 16 | 1 | 473736 | | | | |
| PLASTIC ABS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| PLASTIC OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| OTHER | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| RECONDITIONED CAST IRON | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| TOTAL | 0 | 472008 | 35480 | 562 | 67 | 9 | 508126 | | | | |
| Describe Other Material: | | | | | | | | | | | |
| 4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION | | | | | | | | | | | |
| | UNKNOWN | PRE-1940 | 1940-1949 | 1950-1959 | 1960-1969 | 1970-1979 | 1980-1989 | 1990-1999 | 2000-2009 | 2010-2019 | TOTAL |

| | | | | | | | | | | | |
|---------------------------|------|--------|--------|--------|---------|---------|--------|---------|---------|--------|---------|
| MILES OF MAIN | 5.92 | 913.84 | 151.32 | 840.14 | 1671.18 | 1050.16 | 930.93 | 1324.84 | 1148.46 | 706.63 | 8743.42 |
| NUMBER OF SERVICES | 0 | 2465 | 470 | 5440 | 13792 | 48021 | 97141 | 216544 | 88307 | 35946 | 508126 |

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

| CAUSE OF LEAK | MAINS | | SERVICES | |
|-----------------------------|-------|-----------|----------|-----------|
| | TOTAL | HAZARDOUS | TOTAL | HAZARDOUS |
| CORROSION FAILURE | 210 | 15 | 15 | 10 |
| NATURAL FORCE DAMAGE | 97 | 20 | 115 | 65 |
| EXCAVATION DAMAGE | 201 | 195 | 731 | 721 |
| OTHER OUTSIDE FORCE DAMAGE | 15 | 6 | 70 | 64 |
| PIPE, WELD OR JOINT FAILURE | 158 | 18 | 156 | 48 |
| EQUIPMENT FAILURE | 25 | 4 | 5 | 1 |
| INCORRECT OPERATIONS | 1 | 0 | 5 | 0 |
| OTHER CAUSE | 79 | 2 | 0 | 0 |

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 919

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 889

- a. One-Call Notification Practices Not Sufficient: 130
- b. Locating Practices Not Sufficient: 449
- c. Excavation Practices Not Sufficient: 301
- d. Other: 9

2. NUMBER OF EXCAVATION TICKETS : 291577

PART E - EXCESS FLOW VALUE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 15743

Estimated Number Of Services with EFV In the System At End Of Year: 59461

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 110

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 110

**These questions only pertain to reporting years 2017 & beyond.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL INPUT FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

INPUT FOR YEAR ENDING 6/30: 1.88%

PART H - ADDITIONAL INFORMATION

PART I - PREPARER

| | |
|---|---|
| | |
| Nicole Christianer, Manager, Pipeline Safety (Preparer's Name and Title) | (314) 349-2929 _____ (Area Code and Telephone Number) |
| | |
| nicole.christianer@spireenrgy.com (Preparer's email address) | _____ (Area Code and Facsimile Number) |

Missouri Public Service Commission

Respond Data Request

| | |
|--------------------------|--|
| Data Request No. | 0015 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Gas Safety Department |
| Description | 3. Does the Gas Safety Department agree that all of the non-cathodically protected steel services currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition? a. Please explain the answer and provide all documents in Staff's possession that supports its answer. |
| Response | The Safety Engineering Staff does not agree that all of the non-cathodically protected steel services currently in service are in a "worn out" or "deteriorated condition", because the Missouri Public Service Commission's Pipeline Safety Rules do not include definitions of when natural gas piping is considered to be "worn out" or in a "deteriorated condition". The Commission's Pipeline Safety Rules require cathodic protection for each buried or submerged pipeline installed after July 31, 1971 within one year after completion of construction (20 CSR 4240-40.030(9)(D)), with some exceptions noted in the rule. Additionally, the Commission's Pipeline Safety Rules addressing the requirements for replacement of non-cathodically protected steel services are found in 20 CSR 4240-40.030(15)(C). Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2019-0356** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed,

Schedule JAR-D-16

typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security : Public

Rationale : NA

Missouri Public Service Commission

Respond Data Request

| | |
|--------------------------|--|
| Data Request No. | 0016 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Cast Iron Mains |
| Description | 4. Has Spire Missouri ever reported that all of the cast iron mains currently in service in each of its service territories are worn out or in a deteriorated condition to the MoPSC Gas Safety Department? a. If so what actions has the Gas Safety Department taken in response to this report? |
| Response | Question as to what Spire Missouri has ever reported to Safety Engineering Staff is overbroad and vague. Question is irrelevant and not reasonably calculated to lead to probative evidence that determines whether the ISRS costs sought for recovery in the application are eligible under the ISRS statute. Data Request Response provided by Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2019-0356** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.

| | |
|--------------------|--------|
| Security : | Public |
| Rationale : | NA |

Schedule JAR-D-16

Missouri Public Service Commission

Respond Data Request

| | |
|--------------------------|--|
| Data Request No. | 0016 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Cast Iron Mains |
| Description | 4. Has Spire Missouri ever reported that all of the cast iron mains currently in service in each of its service territories are worn out or in a deteriorated condition to the MoPSC Gas Safety Department? a. If so what actions has the Gas Safety Department taken in response to this report? |
| Response | a. Based on Safety Engineering Staff's review, Staff is not aware that Spire Missouri has ever reported to the Commission that all of the cast iron mains currently in service are worn out or in a deteriorated condition. There are no reports known to the Safety Engineering Staff that require operators to make qualitative, general statements or observations as to the condition of "all" pipe or all cast iron pipe. Instructions to operators for completing PHMSA distribution annual reports (FORM PHMSA F 7100.1-1) prior to 2015 included the following instruction: "Leaks from material deterioration, other than corrosion, after exceeding the reasonable service life, are reported under Other." Beginning with the 2015 PHMSA annual report, this instruction was changed to read as follows: "OTHER CAUSE: leak resulting from any other cause not attributable to the above causes. A best effort should be made to assign a specific leak cause before choosing the Other cause category. An operator replacing a bare steel pipeline with a history of external corrosion leaks without visual observation of the actual leak, may form a hypothesis based on available information that the leak was caused by external corrosion and assign the Corrosion cause category to the leak." Spire submits PHMSA annual reports and other reports required by the PSC regarding pipe conditions related to specific PSC requirements that may indicate specific pipe segments are deteriorated. Examples include but are not limited to pipe material failures that result in reportable incidents (incident reports), number of leaks repaired each year by material, including cast iron and unprotected steel (Missouri Annual Reports), number of leaks reported in "other" and "corrosion" categories on PHMSA annual reports, number of fractures on cast iron (annual replacement program reports). b. The Safety Engineering Staff reviews each report and investigates each reportable incident for compliance with Commission pipeline safety rules and Commission orders. Safety Engineering Staff review was limited to within the past ten years pursuant to guidance issued by the Regulatory Law Judge at the September 13, 2019 telephone discovery conference. Data |

Schedule JAR-D-16

Request Response provided by Greg Williams
(greg.williams@psc.mo.gov) and Bob Berlin
(bob.berlin@psc.mo.gov).

Objections

NA

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2019-0356** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.

Security : Public

Rationale : NA

Schedule JAR-D-16

Missouri Public Service Commission

Respond Data Request

| | |
|--------------------------|--|
| Data Request No. | 0017 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Steel Mains |
| Description | 5. Has Spire Missouri ever reported that all of the non-cathodically protected steel mains currently in service in each of its service territories are worn out or in a deteriorated condition to the MoPSC Gas Safety Department? a. If so what actions has the Gas Safety Department taken in response to this report? |
| Response | |
| Objections | Question as to what Spire Missouri has ever reported to Safety Engineering Staff is overbroad and vague. Question is irrelevant and not reasonably calculated to lead to probative evidence that determines whether the ISRS costs sought for recovery in the application are eligible under the ISRS statute. Data Request Objection provided by Bob Berlin (bob.berlin@psc.mo.gov) |

The attached information provided to **Missouri Public Service Commission** Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the **Missouri Public Service Commission** if, during the pendency of Case No. **GO-2019-0356** before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information. If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the **MO PSC Staff-(All)** office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to **MO PSC Staff-(All)** and its employees, contractors, agents or others employed by or acting in its behalf.

| | |
|--------------------|--------|
| Security : | Public |
| Rationale : | NA |

Schedule JAR-D-16

Missouri Public Service Commission

Respond Data Request

| | |
|--------------------------|--|
| Data Request No. | 0017 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Steel Mains |
| Description | 5. Has Spire Missouri ever reported that all of the non-cathodically protected steel mains currently in service in each of its service territories are worn out or in a deteriorated condition to the MoPSC Gas Safety Department? a. If so what actions has the Gas Safety Department taken in response to this report? |
| Response | According to annual reports submitted by Spire, Spire has no remaining non-cathodically protected steel mains currently in service in either of Spire's Missouri service territories. Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

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| Security : | Public |
| Rationale : | NA |

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Missouri Public Service Commission

Respond Data Request

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| Data Request No. | 0018 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Safety |
| Description | Has Spire Missouri ever reported that all of the non-cathodically protected steel services currently in service in each of its service territories are worn out or in a deteriorated condition to the MoPSC Gas Safety Department? a. If so what actions has the Gas Safety Department taken in response to this report? |
| Response | |
| Objections | Question as to what Spire Missouri has ever reported to Safety Engineering Staff is overbroad and vague. Question is irrelevant and not reasonably calculated to lead to probative evidence that determines whether the ISRS costs sought for recovery in the application are eligible under the ISRS statute. Data Request Objection provided by Bob Berlin (bob.berlin@psc.mo.gov). |

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| Security : | Public |
| Rationale : | NA |

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Missouri Public Service Commission**Respond Data Request**

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| Data Request No. | 0019 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Safety |
| Description | <p>7. Please provide a copy of the last three annual reports that the MoPSC's Gas Safety Department has prepared with regard to Spire Missouri and its related service territories based on the Staff's safety audits of those systems. a. For each report, please indicate whether the report agrees with the assertion that all of the cast iron mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. i. For each report that does agree with the assertion that all of the cast iron mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition, please indicate by page number where the report discusses the impact of that fact on the safety of Spire's gas distribution system. ii. For each report that does agree with the assertion that all of the cast iron mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition but does not discuss the impact of that fact on the safety of Spire's gas distribution system, please explain why. iii. If any report does not agree with or otherwise mention the assertion that all of the cast iron mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition, please indicate whether the conclusions reached in that report would change if the report had agreed with the assertion that all of the cast iron mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. b. For each report, please indicate whether the report agrees with the assertion that all of the non-cathodically protected steel mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. i. For each report that does agree with the assertion that all of the non-cathodically protected steel mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition, please indicate by page number where the report discusses the impact of that fact on the safety of Spire's gas distribution system. ii. For each report that does agree with the assertion that all of the non-cathodically protected steel mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition but does not discuss the impact of that fact on the safety of Spire's gas distribution system, please explain why. iii. If any report does not agree with or otherwise mention the assertion that all of the non-cathodically protected steel mains</p> |

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currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition, please indicate whether the conclusions reached in that report would change if the report had agreed with the assertion that all of the non-cathodically protected steel mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. c. For each report, please indicate whether the report agrees with the assertion that all of the non-cathodically protected steel services currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. i. For each report that does agree with the assertion that all of the non-cathodically protected steel services currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition, please indicate by page number where the report discusses the impact of that fact on the safety of Spire's gas distribution system. ii. For each report that does agree with the assertion that all of the non-cathodically protected steel services currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition but does not discuss the impact of that fact on the safety of Spire's gas distribution system, please explain why. iii. If any report does not agree with or otherwise mention the assertion that all of the non-cathodically protected steel services currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition, please indicate whether the conclusions reached in that report would change if the report had agreed with the assertion that all of the non-cathodically protected steel services currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition.

Response

Objections

MO PSC Safety Engineering Staff does not prepare annual reports for Spire Missouri. Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov).

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Security : Public
Rationale : NA

Missouri Public Service Commission

Respond Data Request

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|--------------------------|---|
| Data Request No. | 0020 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Safety |
| Description | Please indicate whether the MoPSC's Gas Safety Department believes that Spire has met its statutory duty to provide safe and adequate service under section 393.130 if it assumes that all of the cast iron mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. |
| Response | The Safety Engineering Staff does not form opinions regarding pipeline conditions outside the parameters of the Commission's Pipeline Safety Rules, and cannot hypothesize as to whether safe and adequate service has been provided based on an unfounded assumption. Further, the terms "worn out" and "deteriorated" are not defined in the Pipeline Safety Rules and as such are not part of Safety Engineering Staff's pipeline safety inspections. Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

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| Security : | Public |
| Rationale : | NA |

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Missouri Public Service Commission

Respond Data Request

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| Data Request No. | 0021 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Safety |
| Description | Please indicate whether the MoPSC's Gas Safety Department of the Missouri Public Service Commission believes that Spire has met its statutory duty to provide safe and adequate service under section 393.130 if it assumes that all of the non-cathodically protected mains currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. |
| Response | According to annual reports submitted by Spire, Spire has no remaining non-cathodically protected steel mains currently in service in Spire's Missouri service territories. Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

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| Security : | Public |
| Rationale : | NA |

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Missouri Public Service Commission

Respond Data Request

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| Data Request No. | 0022 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Safety |
| Description | Please indicate whether the Gas Safety Department of the Missouri Public Service Commission believes that Spire has met its statutory duty to provide safe and adequate service under section 393.130 if it assumes that all of the non-cathodically protected services currently in service in each of Spire Missouri's service territories are in a worn out or deteriorated condition. |
| Response | See answer to #20. Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

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| Security : | Public |
| Rationale : | NA |

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Missouri Public Service Commission

Respond Data Request

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| Data Request No. | 0023 |
| Company Name | MO PSC Staff-(All) |
| Case/Tracking No. | GO-2019-0356 |
| Date Requested | 9/4/2019 |
| Issue | General Information & Miscellaneous - Safety |
| Requested From | Bob Berlin |
| Requested By | John Clizer |
| Brief Description | Safety |
| Description | Please indicate whether the service of mains or services that form part of a gas distribution system and which are worn out or in a deteriorated condition presents a safety concern. |
| Response | Aside from the safety concerns specifically delineated in the Commissions pipeline safety rules (e.g. incidents and safety related conditions in 20 CSR 4240-40.020, and the pipeline safety and integrity requirements in 20 CSR 4240-40.030), Commission Staff, including Safety Engineering Staff, rely on the observations and determinations of utility management and operations personnel on the condition of the gas distribution system. Data Request Response provided by Greg Williams (greg.williams@psc.mo.gov) and Bob Berlin (bob.berlin@psc.mo.gov). |
| Objections | NA |

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| Security : | Public |
| Rationale : | NA |

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