

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Request of Spire Missouri Inc.)
for a Temporary Waiver from Commission Rules) **File No. GE-2020-0373**
20 CSR 4240-40.030 (9)(Q), (13)(M), (15)(C),)
(15)(D) and (15)(E) and Orders Pertaining to)
Inspections and Replacements)

SPIRE MISSOURI INC’S RESPONSE TO STAFF’S JUNE 5TH FILING

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), on behalf of its operating units, Spire Missouri East (“Spire East”) and Spire Missouri West (“Spire West”) and files this Response to the Staff of the Missouri Public Service Commission’s (“Staff”) June 5, 2020 filing, *Staff Response*. In response to the Staff’s filing, Spire Missouri respectfully states as follows:

1. Spire Missouri would like to recognize and thank the Staff for the immense amount of work Staff has had to endure to review Spire Missouri’s request and prepare its recommendation in this case. The immediate and quick attention to these waivers will enable the Company to keep customers and employees safe, while also maintaining the safety of its system during these unprecedented times.

2. In the interest of efficiency, Spire Missouri will only address the parts of Staff’s June 5, 2020 filing that requires additional clarification, or which Spire Missouri takes a different position from Staff. Spire Missouri will therefore comment on Staff Recommendations 1, 2, 4, 6 and 7.

3. Staff Recommendation 1. Spire Missouri agrees to file a list of non-compliances that have already occurred by May 15, 2020. Spire Missouri will provide a copy of this list to the Staff after this filing.

4. Staff Recommendations 2 and 4. Staff modified its original recommendation regarding the prioritizing of delinquent inspections so that it now reads:

Spire shall begin inspecting non-compliances with the oldest (**most delinquent**) identified population of delinquent facility inspections first, and shall complete this work no later than January 1, 2021.

While Staff's recommendation is well intended, what Staff is proposing is not the most practical approach when trying to prioritize and schedule these inspections due to the fact that the inspections are completed by appointment and therefore subject to customer availability. Spire Missouri believes that inspections will be completed more quickly and therefore gas safety will be better maintained, by sending letters requesting an appointment to all delinquent inspections by population simultaneously. Since ACI inspections must be completed by appointment, lettering simultaneously allows the Company to obtain the earliest appointment time a customer is available. The Company will agree to prioritize the delinquent inspections by population based on the timeframe of the delayed work. As noted, these inspections will be completed pending customer availability and provided customers have no objection to a Company representative entering their buildings.

5. Staff Recommendation 6. Spire Missouri inadvertently failed to identify its disagreement with Staff's recommendation (6(f)) that unprotected steel service and

yard line replacements be prioritized “with the oldest identified population of facilities first.” The Company believes that scheduling the unprotected steel service and yard line replacements by proximity to each other will enable the Company to complete all replacements more quickly and efficiently. The Company also believes that there should be scheduling flexibility to accommodate any services that may have a condition that supports earlier replacement. In addition, the Company may be limited on the order in which it can complete the replacements depending on the customer’s willingness to allow the Company into their home to complete turn-ons as required by the Company’s gas safety standards.

6. Staff Recommendation 7. The Staff stated in its response that since the orders referenced do not have a mandated replacement date, it needed additional clarification from what the Company is seeking a waiver from. The Company is referring specifically to the requirements in GO-91-275 under the Ongoing Replacement Program that requires that “Cast-Iron low pressure main areas with two or more existing breaks will be replaced or eliminated within three years of the discovery of a new break,” and Cast-iron low pressure main areas with one existing break will be replaced or eliminated within five years of the discovery of a new break.” The Company is referring specifically to the requirements in GO-2002-50 that requires that “Any new break after July 1, 2001, within 500 feet of a previously recorded break triggers a minimum replacement of 500 feet of main within five years of the discovery date of the new break.” And “Any additional break on a segment of pipe targeted for replacement will accelerate the completion date to within 24 months of the discovery date of the additional break, or five years from the original trigger date, whichever cause the replacement to be

completed sooner.” The Company is seeking the waiver for replacement timing based on the two and three main break conditions of these requirements.

WHEREFORE, Spire Missouri, Inc. respectfully requests that the Commission approve the Company’s Request for Temporary Waiver consistent with the terms set forth herein.

Respectfully submitted,

/s/ Goldie T. Bockstruck _____
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ATTORNEY FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8th day of June, 2020.

/s/ Goldie T. Bockstruck _____

