

Exhibit No:
Issue: Worn Out or Deteriorated Cast
Iron and Bare Steel

Witness: William Honeycutt
Type of Exhibit: Direct Testimony
Sponsoring Party: Spire Missouri Inc.
Case Nos.: GO-2018-0309, GO-2018-0310
Date Prepared: May 13, 2020

SPIRE MISSOURI, INC.

File Nos. GO-2018-0309, GO-2018-0310

DIRECT TESTIMONY
OF
WILLIAM HONEYCUTT

MAY 2020

DIRECT TESTIMONY OF WILLIAM HONEYCUTT

1 Q. PLEASE STATE YOUR NAME.

2 A. My name is William Honeycutt.

3 Q. BY WHOM ARE YOU EMPLOYED?

4 A. I am presently employed by Spire Missouri Inc. (“Spire”). I work in the Spire East service
5 area as a Leak Truck Foreman.

6 Q. ARE YOU ALSO A UNION MEMBER?

7 A. Yes, I am a member of Gas Workers Local 11-6 (the “Union”). I also serve as Secretary
8 for the Union.

9 Q. PLEASE STATE YOUR BUSINESS ADDRESS.

10 A. I report to work each day at Spire’s Shrewsbury Service Center at 4118 Shrewsbury
11 Avenue in St. Louis, Missouri. The Union’s business address is:
12 Gas Workers Local 11-6
13 7750 Olive Boulevard
14 St. Louis, MO 63130

15 Q. HOW MANY MEMBERS ARE INCLUDED IN THE UNION?

16 A. We currently have 998 active members.

17 Q. HOW LONG HAS THE UNION BEEN IN PLACE?

18 A. Gas Workers Local 11-6 Union has existed for 85 years.

19 Q. DOES THE UNION HAVE ANY PROFESSIONAL AFFILIATIONS?

20 A. Yes. We are affiliated with the St. Louis AFL-CIO and the Missouri AFL-CIO.

21 Q. PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND
22 BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.

1 A. I have been at Spire for 20 years. I have worked in the Leak Department for the past 19
2 years. My responsibilities as Leak Truck Foreman is to repair the leaking mains and service
3 lines and to respond to emergency gas leaks.

4 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE REGARDING**
5 **PIPELINE WORK.**

6 A. In my 20 years in the field for Spire, I have worked on large diameter cast iron mains, many
7 of them from 12” to 30” medium pressure (“MP”) mains. I have witnessed these cast iron
8 mains blowing apart and leaking at the bell joints. I have also worked on bare steel mains
9 and service lines. In addition, I have worked on different parts of the distribution system
10 at Spire, and have seen all of the various pressures in mains and service lines.

11 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

12 A. I am a high school graduate and I also took a number of general studies college courses at
13 Meramec Community College.

14 **I. PURPOSE OF DIRECT TESTIMONY**

15 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

16 A. The purpose of my testimony is to provide my perspective as someone who has seen
17 firsthand the deteriorated condition of Spire’s cast iron and steel facilities, and address the
18 importance of its cast iron and bare steel pipeline replacement programs.

19

20 **II. FIELD EXPERIENCE**

21 **Q. WHAT HAS BEEN THE MAIN DRIVER FOR THE PIPELINE WORK YOU**
22 **HAVE PERFORMED?**

1 A. The majority of the work I have performed has been related to safety issues: repairing
2 leaking mains and service lines and responding to emergency gas leaks.

3 **Q. PLEASE DESCRIBE WHAT YOU HAVE OBSERVED REGARDING CAST IRON**
4 **MAIN AND BARE STEEL DURING YOUR LEAK SERVICE WORK.**

5 A. I have seen these mains fall apart after we dug them up due to the age of the pipe.

6 **Q. HAVE YOU WITNESSED PIPELINE AND OTHER PROPERTY DAMAGE**
7 **RESULTING FROM PIPE FAILURE?**

8 A. Yes, I have.

9 **Q. PLEASE DESCRIBE WHAT YOU HAVE WITNESSED.**

10 A. More recently, in December of 2018, I was working on a job at 4900 Fyler, when the 12”
11 cast iron MP main blew apart. We had to put residents in hotel rooms for the safety of our
12 customers. I also recall that in the summer of 2012, a 12” MP main fell apart at Clara and
13 Enright, resulting in a fire that burned one of our backhoes.

14 **Q. WHAT TYPE OF PIPE HAVE THESE EXPLOSIONS OCCURRED ON?**

15 A. In both cases, the pipe was a 12” MP cast iron main.

16 **Q. ARE YOU FAMILIAR WITH THE AGE OF THESE PIPES?**

17 A. Yes, I have worked on pipelines that were installed as far back as 1895. The steel and cast
18 iron are all old pipe. In my opinion, the steel pipe produced in the 1940’s isn’t as good
19 quality because of the war effort going on at that time. That’s because the better steel was
20 going to the war effort.

21 **Q. PLEASE DESCRIBE THE CONDITION OF THE CAST IRON PIPE THAT YOU**
22 **HAVE SEEN AS PART OF YOUR WORK.**

1 A. I have seen cracked cast iron pipes and leaking bell joints due to the deterioration that has
2 occurred over their lives. I've also seen graphitization on cast iron mains.

3 **Q. PLEASE DESCRIBE THE CONDITION OF THE STEEL PIPE THAT YOU HAVE**
4 **SEEN AS PART OF YOUR WORK.**

5 A. I have seen steel pipe fall apart due to corrosion over time. Steel installed in the 1940's
6 was in worse shape, I believe, due to the war effort.

7 **Q. SINCE YOU ARE ON A LEAK TRUCK, IS ALL THE CAST IRON AND STEEL**
8 **PIPE YOU SEE AT A JOB WORN OUT?**

9 A. The leaking pipe is worn out. However, sometimes I am called out on a service line leak
10 where the main is not leaking. In fixing the service line, I often have to expose the main
11 to attach the service line. In these cases, I have seen cast iron main, and it is always in a
12 deteriorated condition, that is, it shows at least some signs of pitting or corrosion.
13 Sometimes the condition of the cast iron is bad enough that I will check to see when the
14 strategic replacement program is coming to that area, because I know that the cast iron is
15 nearly worn out.

16 **Q. CAN YOU COMPARE THE CONDITION OF THE LEAKING CAST IRON AND**
17 **BARE STEEL THAT YOU WORK ON AS LEAK TRUCK FOREMAN TO THE**
18 **CAST IRON AND BARE STEEL YOU SEE THAT IS NOT LEAKING?**

19 A. The leaking cast iron and bare steel is deteriorated and worn out. The other cast iron and
20 bare steel I have seen is just deteriorated. The pipes that are being replaced in the strategic
21 program are similar in age and condition to the leaking pipes I helped replace. It was just
22 a matter of time before the pipes in the replacement programs crossed the line from
23 deteriorated to becoming completely worn out and failing.

1 **Q. WOULD YOU AGREE THAT THE CAST IRON AND STEEL PIPE THAT YOU**
2 **HAVE SEEN ARE WORN OUT OR IN A DETERIORATED CONDITION?**

3 A. Yes. All of the cast iron and steel I have seen is deteriorated. The cast iron and steel pipes
4 I helped replaced were completely worn out.

5 **III. CONCLUSION**

6 **Q. IN YOUR PROFESSIONAL EXPERIENCE, SHOULD CAST IRON AND BARE**
7 **STEEL PIPE THAT HAVE BEEN IN THE GROUND FOR AT LEAST 50 YEARS**
8 **BE REPLACED AS A MATTER OF SAFETY?**

9 A. Yes. I think that is important for the safety of our customers, my fellow workers and the
10 general public.

11 **Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY?**

A. Yes.

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

In the Matter of the Application of Spire)
Missouri Inc. to Establish an Infrastructure)
System Replacement Surcharge in its Spire) **File No. GO-2018-0309**
Missouri East Service Territory)

In the Matter of the Application of Spire)
Missouri Inc. to Establish an Infrastructure)
System Replacement Surcharge in its Spire) **File No. GO-2018-0310**
Missouri West Service Territory)

A F F I D A V I T

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

William Honeycutt, of lawful age, being first duly sworn, deposes and states:

1. My name is William Honeycutt. I am Leak Truck Foreman for Spire Missouri. My business address is 4118 Shrewsbury Avenue, St. Louis, MO 63119.
2. Attached hereto and made a part hereof for all purposes is my direct testimony on behalf of Spire Missouri Inc.
3. Under penalty of perjury I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

William Honeycutt
William Honeycutt

This 13th day of May 2020.