

**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) **File No. GS-2022-0261**
Gas Safety Found at 20 CSR 4240-40.030)

PROGRESS REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Progress Report* states:

1. On March 29, 2022, Staff filed a motion requesting that the Commission open a case to investigate Spire Missouri’s compliance with the Commission’s rules regarding gas safety rules, specifically related to the timeliness of Spire Missouri’s efforts to locate and mark its natural gas pipelines to prevent damage to those pipelines by excavators.

2. On April 6, 2022, the Commission granted Staff’s motion and ordered Staff to file a progress report regarding its investigation no later than October 6, 2022.

3. On October 5, 2022, Staff filed a progress report stating that it was continuing to conduct discovery in this matter.

4. On October 12, 2022, the Commission ordered Staff to file either a final report, or a further progress report regarding its investigation, no later than January 11, 2023.

5. On January 10, 2023, Staff filed a progress report stating that it was continuing to conduct discovery in this matter.

6. On January 10, 2023, the Commission ordered Staff to either a final report, or a further progress report regarding its investigation, no later than April 11, 2023.

7. On April 6, 2023, Staff filed a progress report stating that it was continuing to conduct discovery in this matter and Spire Missouri had requested additional time to revise and supplement some of its responses. Staff requested to file a report regarding its investigation, or a report on the investigation's progress, no later than July 25, 2023.

8. On July 24, 2023, Staff filed a progress report stating that Spire Missouri has updated responses and responded to new data requests, and Staff will review the responses and update the data analysis prior to finalizing its report. Staff requested additional time to review Spire Missouri's responses, complete a draft report, submit its report to internal review, and receive and review Spire Missouri's identification of confidential information and feedback on the report's facts section. Staff requested a due date of no later than September 25, 2023, to file a report regarding its investigation, or a report on the progress of Staff's investigation.

9. On July 26, 2023, the Commission ordered Staff to file either a final report, or a further progress report regarding its investigation, no later than September 25, 2023.

10. Since Staff's July 24, 2023 progress report, Spire Missouri has updated some of its previous responses to Staff data requests. Staff has also continued to conduct discovery by submitting additional data requests. Staff will review Spire's updates to previous data requests and its responses to new Staff data requests in order to update Staff's analysis prior to finalizing its report.

11. Staff requires additional time to review and analyze recent data provided by Spire before finalizing its investigation report. Staff will use this time to review Spire Missouri's responses, complete a draft report, submit its report to internal review, and receive and review Spire Missouri's identification of confidential information and feedback on the report's facts section. Staff requests a due date of no later than

November 30, 2023, to file a report regarding its investigation, or a report on the progress of Staff's investigation.

WHEREFORE, for the above-stated reasons, Staff respectfully requests the Commission order Staff to file a report regarding its investigation, or a report on the progress of Staff's investigation, no later than November 30, 2023.

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 25th day of September, 2023.

/s/ J. Scott Stacey