

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

In the Matter of the Application of Spire Missouri Inc. for a permanent waiver from the requirement to use a “device” for overpressure protection in 20 CSR 4240-40.030 (4)(12) and (13) for certain Spire East facilities)))))	Case No. GE-2023-0112
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**SPIRE MISSOURI’S REQUEST FOR ADDITIONAL TIME
TO RESPOND TO STAFF RECOMMENDATION**

COMES NOW Spire Missouri Inc. (“Spire Missouri or “the Company”) respectfully submits this Request for Additional Time to Respond to the Recommendation of the Staff of the Missouri Public Service Commission (“Staff”) as follows:

1. On September 23, 2022, Spire Missouri submitted its application requesting a permanent waiver of compliance for certain Spire Missouri facilities from 20 CSR 4240-40.030(4)(CC), 20 CSR 4240-40.030(4)(EE)9., 20 CSR 4240-40.030 (4)(FF)3., 20 CSR 4240-40.030(12)(M)2., and 20 CSR 4240-40.030(13)(R)1.G. of the pipeline safety standards of the Missouri Public Service Commission (“Commission”).
2. On September 26, 2022, the Commission directed Staff to file its recommendation no later than October 26, 2022.
3. Staff has filed a series of Status Reports and Motions for Extensions to file its recommendation. Over its year-long review, during which Staff coordinated with the Pipeline and Hazardous Materials Safety Administration (PHMSA), Spire has been responsive to data requests and has filed additional supplements to its application.
4. On July 28, 2023, the Commission issued an order directing Staff to file a Recommendation no later than September 29, 2023.

5. On September 29, 2023, Staff submitted its memorandum recommending that that the Commission deny Spire Missouri's waiver request Application as filed and supplemented. Staff further recommended the Commission direct Spire Missouri to perform extensive, additional actions as detailed in the Staff recommendation.

6. After reviewing Staff's memorandum, the Company requests additional time to evaluate Staff's recommendations and provide a thorough response. Spire Missouri requests an additional 60 days until December 9, 2023 to file such response.

WHEREFORE, Spire Missouri respectfully requests that the Commission grant Spire until December 9, 2023 to file a response to Staff's recommendation.

Respectfully submitted,

/s/ J. Antonio Arias

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record on this 9th day of October, 2023.

/s/ J. Antonio Arias

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