

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

In the Matter of an Investigation into)
Spire Missouri Inc. d/b/a Spire)
Concerning a Natural Gas Incident In)
Holt, Missouri)
File No. GS-2024-0000

STAFF’S MOTION TO ESTABLISH A CASE

COMES NOW the Staff of the Missouri Public Service Commission (hereafter the “Staff” or Commission”), by and through counsel, and for its Motion to Establish a Case states as follows:

1. Pursuant to Section 386.310 of the Revised Statutes of Missouri (“RSMo”), the Commission has the authority to require every gas utility, including municipal gas systems, to operate its system in a manner that promotes and safeguards the health and safety of its employees, customers, and the public.
2. The Commission has jurisdiction to regulate gas pipeline safety under Section 386.310, RSMo.
3. A public utility that owns any gas plant is subject to the provisions of Section 386.572, RSMo., for violation of any law, order, decision, decree, rule, direction, demand, or requirement of the Commission. § 386.572, RSMo.
4. Spire Missouri Inc. d/b/a Spire (“Spire”) is a public utility under Section 386.020, RSMo.
5. Spire Missouri owns and operates a gas plant and is subject to the provisions of Section 386.572, RSMo.
6. The monetary penalties for violations of such gas safety standards are set forth in Sections 386.572.2 and .3, RSMo and are considered “separate and distinct

offenses, regardless of whether such violations relate to the same incident. In the case of a continuing violation, each day's continuance thereof shall be a separate and distinct offense."

7. A reportable natural gas incident¹ occurred on Thursday, October 5, 2023, in Holt, Missouri, an area served by Spire. An employee of a contractor working on behalf of Spire was injured while working on Spire's 12-inch high-pressure² steel distribution main ("the main"). A segment of the main had become exposed and was unsupported at a location crossing the Muddy Fork. New pipe had been installed under the Muddy Fork to replace the exposed segment. Specialized pipeline tapping equipment was used to start the flow of gas in the new pipeline crossing and then to stop the flow of gas in the existing pipeline on either side of the Muddy Fork. After depressurizing the existing pipeline segment, a short pipe section (approximately 2-feet long) was cut and removed from the pipeline on the west side of Muddy Fork to enable a cap to be installed to seal the pipe. In preparation for cap installation, plugs were being inserted into both open pipe ends. The first plug installed in the open pipe to the west was ejected under pressure as an employee of the contractor was working to install a plug in the open pipe to the east, injuring the employee.

8. A Safety Engineering Department Staff member visited the site location on October 6, 2023, to discuss the work being performed and events leading up to the incident. Staff intends to further investigate the adequacy of and adherence to procedures used on this project, suitability of the equipment used, training of Spire and

¹ See 20 CSR 4240-40.020(3) and (4) for reporting requirements.

² The Maximum Allowable Operating Pressure for this pipeline is 150 psig.

contractor personnel on the procedures, and adequacy of measures to prevent accidental releases of gas and injuries during implementation of the procedures.

9. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Department.

10. Staff further recommends the Commission direct that the report, or a status report, be filed by March 29, 2024.

WHEREFORE, for the reasons set forth above, Staff respectfully requests the Commission establish a case for the purpose of receiving a report, or status report, as described herein, and for any other such orders and relief as it deems just and appropriate under the circumstances.

Respectfully submitted,

/s/ 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 16th day of October, 2023.

/s/ J. Scott Stacey