

**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)	<u>File No. GS-2022-0047</u>
Rules Regarding Natural Gas Safety)	
Found at 20 CSR 4240-40.030)	

STAFF'S INVESTIGATION REPORT

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and in response to the Commission's November 7, 2023 *Order Directing Staff Report* states:

1. On August 24, 2021, Staff filed a motion requesting the Commission open a case to investigate Spire Missouri Inc. d/b/a Spire's ("Spire") compliance with the Commission's natural gas safety rules located in 20 CSR 4240-40.030.

2. On September 1, 2021, the Commission granted Staff's motion and ordered Staff to investigate Spire's compliance with the Commission's gas safety rules related to the mechanical joining qualifications of its employees. The Commission further ordered Staff to file progress reports regarding its investigation.

3. From February 28, 2022 through November 7, 2023, Staff conducted discovery in regards to: a) the scope of expired plastic pipe joiner qualifications in the Spire Missouri East and Spire Missouri West operating areas; b) the extent of plastic pipe joints installed in the Spire Missouri East and Spire Missouri West operating areas by joiners with expired qualifications; c) training and qualification programs and procedures related to joining of plastic pipe; d) leaks associated with joints completed by joiners with expired qualifications; e) Spire's actions regarding joiners with expired qualifications; f) Spire's actions regarding joints completed by joiners with expired qualifications;

and g) Spire's documentation and records pertaining to plastic pipe joints on its pipeline facilities.

4. Staff also reviewed discovery responses and submitted additional discovery requests, as well as performing field inspections and observations during this time frame as indicated in Staff's six progress reports.

5. At Staff's request, a survey of other of other state pipeline safety programs was conducted to inquire if similar compliance issues have been identified by other states during their inspection of distribution systems under their respective jurisdictions, and corresponding corrective actions. Staff evaluated the applicability of corrective actions by other states to the present case, as well as Spire's recommended actions in making its recommendations.

6. Staff filed its most recent progress report with the Commission on October 26, 2023; wherein, Staff indicated it had submitted a detailed description of the facts to be included as Appendix A in Staff's report to Spire for its review and identification of confidential information. Staff also requested additional time to receive that information from Spire and to finalize the report.

7. On October 30, 2023, Spire provided its comments to Staff. Staff has considered and addressed Spire's comments.

8. On November 7, 2023, the Commission granted Staff's motion and ordered Staff to file its investigation report or a report on the progress of the investigation no later than November 15, 2023.

9. Based on Staff's investigation, Staff submits the attached Staff Investigation Report and Recommendations, and its Appendices A – C, incorporated by reference herein, as Ordered by the Commission.

10. Staff has identified violations of the Commission's pipeline safety standards as promulgated in 20 CSR 4240-40.030 that are set out in Staff's Investigation Report, which warrant the filing of a Complaint against Spire. The Investigation Report also sets out recommendations related to the violations of the Commission's pipeline safety standards as set forth in 20 CSR 4240-40.030. The intended effect of these Staff recommendations is to further evaluate the potential public safety risks associated with the installed joints, and to prevent a recurrence of the violations. Although Staff recommends that the Commission order Spire to file an action plan within 60 days, which addresses Staff's recommendations, Staff will address this item and its other recommendations the Complaint addressed above.

WHEREFORE, Staff respectfully submits and requests the Commission accept the attached Staff Investigation Report and its Appendices A – C pursuant to the Commission's Order issued on November 7, 2023, and grant such other and further relief as the Commission deems just in the circumstances. Staff intends to follow-up this filing with the filing of a Complaint against Spire which will contain Staff recommendations in addition to identifying and addressing violations of Commission pipeline safety rules.

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 15th day of November, 2023.

/s/ J. Scott Stacey