

**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 ) Case No. GE-2023-0112  
in 20 CSR 4240-40.030 (4)(12) and (13) for )  
certain Spire East facilities )

**JOINT REQUEST FOR EXTENSION**

**COME NOW** Spire Missouri Inc. (“Spire Missouri”) and Staff of the Missouri Public Service Commission (“Staff”), and respectfully submit this *Joint Request for Extension* in response to the Missouri Public Service Commission (“Commission”) order on December 18, 2023, stating the following:

1. On September 23, 2022, Spire Missouri submitted its Application requesting a permanent waiver of compliance for certain Spire Missouri facilities, specifically the Reynolds regulation stations, 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 with the recommendation that the Commission deny Spire Missouri's Application for a waiver as filed and supplemented.

6. On December 11, 2023, Spire Missouri filed its response to Staff's Memorandum and recommendations, proposing an accelerated schedule to either abandon or install temporary stations at the Reynolds regulator stations that are the subject of this case.

7. On December 18, 2023, the Commission ordered the parties to either file a procedural schedule or an alternative pleading by January 4, 2024.

8. As Staff requires additional time to review Spire Missouri's response and proposal and meet with PHMSA, the parties agree that it is appropriate to request until February 5, 2024 to file a status update.

**WHEREFORE**, the parties respectfully request that the Commission order the parties to file a status update by February 5, 2024, and order any other relief as is just and reasonable.

Respectfully submitted,

*/s/ J. Antonio Arias*

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**ATTORNEYS FOR SPIRE MISSOURI INC.**

**/s/ J. Scott Stacey**

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

**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 19th day of December, 2023.

*/s/ J. Antonio Arias*

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J. Antonio Arias