

**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 ) Case No. GS-2022-0047  
Gas Safety Found at 20 CSR 4240-40.030 )

**RESPONSE TO STAFF REPORT AND RECOMMENDATIONS**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”) and submits this *Response to Staff Report and Recommendations* to the Missouri Public Service Commission (“Commission”), stating the following:

1. On August 24, 2021, Staff of the Commission (“Staff”) filed a motion to open a case to investigate Spire’s compliance the Commission’s rules regarding natural gas safety found at 20 CSR 4240-40.030.

2. On September 1, 2021, the Commission issued its order directing Staff to undertake its investigation and file a progress report on the status of its investigation no later than February 28, 2022.

3. Staff filed its first progress report on February 28, 2022. Since then, Staff has filed additional progress reports updating the Commission on the status of its investigation and requesting further time to complete its investigation, which has included performing inspections and issuing data requests.

4. On October 26, 2023, Staff filed its final progress report, stating that it would file its report regarding its investigation no later than November 15, 2023.

5. On November 15, 2023, Staff filed its Report, which included the results of its investigation and a series of recommendations for the Company.

6. Spire Missouri requested additional time to respond to Staff’s Report until January 19, 2024.

7. Spire Missouri acknowledges the findings of Staff's investigation and does not contest the violations that Staff has put forth in its Report. The Company has reviewed Staff's recommendations and appreciates Staff's effort in making recommendations that focus on safety, but also consider the resources of the Company and the present risk in this situation. The Company would emphasize that no joiner was unqualified longer than approximately eight months, and that the average length that a joiner was unqualified was approximately three months. Moreover, during the requalification of all joiners, which took no more than two months to accomplish, no joiner failed to become requalified. Spire Missouri now provides its responses to Staff's recommendations below.

8. **Staff Recommendation 1.** Spire Missouri accepts this recommendation and will remove and replace, by qualified joiner, the two Continental Industries Eliminator mechanical tapping tees.

9. **Staff Recommendation 2.** Spire Missouri has reviewed this recommendation and will develop and implement a written plan for exposing and testing a statistically valid sample of the plastic pipe joints that were installed by joiners during a time interval in which the joiner had not been requalified within 15 months. Spire Missouri does not believe that planning to remove the joints is appropriate, as it has not been determined that the joints were incorrectly installed.

10. **Staff Recommendation 3.** Spire Missouri accepts this recommendation and will provide the written plan to Staff prior to implementation and quarterly updates on the progress and result of such plan.

11. **Staff Recommendation 4.** To the best of the Company's ability, it will track and monitor the total number of leaks eliminated or repaired on plastic pipe joints completed by joiners when requalification had not been completed within 15 months, including those leaks that were

caused by incorrect installation of such joiners. Also, to the best of the Company's ability, Spire Missouri will implement this tracking and monitoring utilizing Staff's recommendations in 4.a. through 4.d. However, Spire Missouri does not agree with Staff's recommendation that when the Company does not expose leaks on plastic pipe joints that may have been completed by joiners when requalification had not been completed within 15 months, that the cause of the leak should be attributed to incorrect installation. Attributing the leak to incorrect installation could result in attributing the leak to an incorrect cause, instead of other possible causes, such as excavation damage or natural forces.

12. **Staff Recommendation 5.** In response to this recommendation, Spire Missouri proposes waiting for the completion of the sample testing to deviate from the leakage survey schedule already utilized by the Company. The approximately 6,112 locations where fittings may have been installed by joiners after their qualifications had lapsed are located across the entire greater St. Louis region, of which Spire Missouri currently performs leakage surveys on a three-year schedule. In order to perform leakage surveys of the joints in question once per calendar year, Spire Missouri would have to devote significant resources to essentially cover the same region that takes three years to cover. Prior to taking such an action, Spire Missouri would propose waiting until the sample testing is performed, so Staff, Spire Missouri, and the Commission may evaluate whether the fittings are leaking, whether those leaks are due to incorrect installation, and where such leaks may be located.

13. **Staff Recommendation 6.** Spire Missouri accepts Staff's recommendation that the Company develop and follow written procedures for monitoring operator qualification ("OQ") expiration dates and conducting field audits to verify the qualification of individuals completing work in the field. However, Spire Missouri is concerned that if it is required to prioritize the

installation of services lines a work type for periodic field audits, as Staff also recommends, this would take resources away from currently prioritized items. The Company performs a considerable number of service line installations per year and prioritizing such installations may result in other items being ignored. The Company would like to discuss the purpose of this recommendation with Staff to determine if Staff's goal can be achieved in a different manner.

14. **Staff Recommendation 7.** Spire Missouri accepts Staff's recommendation that the Company review its OQ Plan to verify that the requalification intervals used in Spire's OQ Program are accurate and comply with minimum code requirements.

15. **Staff Recommendation 8.** Spire Missouri accepts Staff's recommendation to include the information listed in 8.a. through 8.d. For the information recommended in 8.e., the Company believes it is already capturing "sufficient detail" to support the leak cause. 8.f. recommends the Company provide justifications for why a leaking facility is not exposed to determine the leak cause. When Spire Missouri does not expose a leaking facility, the Company performs one of two actions: it will either replace the facility immediately, or the facility will be replaced in the course of the Company's planned replacements. This is because it is often more cost and time effective and convenient for the Company and its customers than digging up and exposing the facilities. A requirement to document justifications would provide no further information beyond reporting which above action the Company takes, both of which result in the leaking facility being replaced.

16. **Staff Recommendation 9.** The Company accepts Staff's recommendations to investigate failures in accordance with SOP 120. C, including testing of failed components to determine root causes of failures, and to train personnel who are likely to be involved in carrying out SOP 120. C procedures. The Company has started a pilot of a training process and is currently

training supervisors, who in turn are training employees, and are using electronic acknowledgements to keep records of such training.

17. Staff's final recommendation is that the Commission order Spire to file an action plan addressing the above-mentioned recommendations within 60 days. As the Company has proposed changes or suggested further discussions with Staff in response to Staff's recommendations, the Company proposes that the Commission allow Staff and the Company additional time to hold such discussions prior to issuing such an order in this docket. The Company would propose an additional 60 days to meet with Staff, at which time Spire Missouri and Staff would file a status report.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission accept this response, order the parties to file a status report by March 19, 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.**

**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 January, 2024.

*/s/ Julie Johnson*

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Julie Johnson