

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

**STAFF'S REPLY**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and in response to the Commission's January 24, 2024, *Order Directing Filing* states:

1. On November 15, 2023, Staff filed its Investigation Report with the Commission; wherein, Staff identified violations of the Commission's pipeline safety standards pursuant to 20 CSR 4240-40.030 and set out nine recommendations.

2. On January 19, 2024, Spire Missouri Inc. d/b/a Spire's ("Spire") responded to Staff's Investigation Report; wherein, Spire agreed with four of Staff's numbered recommendations (Recommendations 1, 3, 7 and 9) and suggested some changes and areas for further discussion with Staff for the remaining 5 of Staff's numbered recommendations (Recommendations 2, 4, 5, 6 and 8). Spire's response to Staff's unnumbered recommendation to the Commission requested an additional 60 days to meet with Staff prior to the issuance of a final order in this matter.

3. On January 24, 2024, the Commission ordered Staff to either reply to Spire's response or to file a status report on when it expects to file a reply no later than February 1, 2024.

4. Based on Staff's review of Spire's response to Staff's Investigation Report, Staff submits the attached Staff Memorandum, incorporated by reference herein, as Ordered by the Commission.

5. Staff's Memorandum reiterates its Investigation Report recommendations and indicates which recommendations both parties agree to and the ones that are still at issue. The Staff Memorandum further provides its reasoning why the non-agreed to recommendations are warranted in evaluating the potential public safety risks associated with the installed joints, and to prevent recurrence of the violations.

6. Staff and Spire appear to be in agreement generally and with that, further discussions may facilitate an agreement on the remaining issues; however, further discussions or potential agreements on the remaining issues would be better suited within the forthcoming Complaint case to be filed. Such Complaint will address the violations as well as Staff's recommendations.

**WHEREFORE**, Staff respectfully submits and requests the Commission accept the attached Staff's Reply pursuant to the Commission's Order issued on January 24, 2024, 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**

J. Scott Stacey  
Deputy Counsel  
Missouri Bar No. 59027  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-522-6279  
573-751-9285 (Fax)  
[scott.stacey@psc.mo.gov](mailto:scott.stacey@psc.mo.gov)

**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 1<sup>st</sup> day of February, 2024.

**/s/ J. Scott Stacey**