

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

In the Matter of Spire Missouri Inc. d/b/a Spire)
And Gateway Infrastructure, LLC Concerning) File No. GS-2023-0372
A Natural Gas Incident at Miller’s Court)
In O’Fallon, Missouri)

SPIRE MISSOURI INC’S RESPONSE TO STAFF’S INCIDENT REPORT

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and pursuant to the Missouri Public Service Commission’s (“Commission”) May 3, 2023 Order, files this Response, and respectfully stating as follows:

1. On March 11, 2022, **[REDACTED]**, performing boring work on behalf of and at the direction of Gateway Infrastructure, LLC (“Gateway”), struck Spire Missouri’s natural gas main assets on Millers Court in O’Fallon, Missouri. This resulted in the explosion of a residence, and fire and damage to multiple other residences.

2. Safety Engineering Staff of the Missouri Public Service Commission (“Staff”) investigated the incident and issued data requests to both Spire Missouri and Gateway.

3. On April 26, 2023, Staff filed its *Incident Report* (“Report”) and requested that the Commission open a docket for accepting this Report and order Spire Missouri and Gateway to respond to Staff’s Report.

4. On May 3, 2023, the Commission issued an Order accepting Staff’s initial report and directing Spire to respond no later than May 30, 2023.

5. In its Report, Staff concluded, based on sufficient facts and information, that Spire Missouri did not violate any statutes, Commission Rules, or Commission Orders. On the other hand, Staff concluded that Gateway violated 20 CSR 4240-18.010, as it failed to maintain at least 12-inches of separation between communications facilities and gas lines, and violated Section 319.037.2. RSMo., as the contractor working on behalf of Gateway failed to confirm the horizontal

and vertical location of the natural gas main in the vicinity of the excavation. Spire Missouri agrees with Staff's findings and conclusions.

6. Spire Missouri issued its response to Staff's Incident Report on May 30, 2023. In response to Staff's second recommendation, that

Staff recommends that Spire evaluate actions that Spire can take to minimize damages to its natural gas pipelines by excavations involving boring and directional drilling. Staff further recommends that Spire submit the results of the evaluation and a schedule for actions to the Commission.

Spire Missouri provided the following response:

Spire Missouri agrees with Staff's recommendation. Spire Missouri has recently implemented a new ticket management system in April 2023 and is piloting a risk model to prioritize excavator communication and onsite monitoring of excavations based on risk. In addition, Spire Missouri introduced an additional line locate company in May 2023 in a portion of the Spire Missouri East territory. Spire Missouri continues to reinforce damage prevention efforts through direct communication with excavators from the Damage Prevention team and annual public awareness mailings and material from the Public Awareness team. The Company is committed to providing a status report of its evaluation within 60 days and more detailed analysis and reporting in the near future.

Spire Missouri now provides the following status update.

7. In April 2023, Spire Missouri implemented a new ticket management system. The Company is continuing to implement full functionality of this system in order to have the most useful information for identifying risk. Each ticket receives a risk score (from 0-100), which depicts the potential consequence should a damage occur. This score is based on the location and type of gas facility within the ticket scope. In addition, each ticket also receives an incident prediction score (from 0-1), which shows the likelihood of damage occurring. There are several factors that are used to calculate this score, such as directional boring and the ticket type. Spire Missouri will continue to import more data into the system in order to enhance the scoring model, which will refine the incident prediction score and allow the Company to identify and eliminate

risk, including excavators' history of damage. Spire Missouri will then be able to utilize the incident score to drive efforts to educate and audit excavators. In May 2023, the Company assigned a portion of territory in Missouri East to an additional line locate company, ** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ** The Company will continue monitoring the timeliness and quality of its vendors. Spire Missouri also continues to communicate with excavators in order to reinforce damage prevention.

8. Spire Missouri also plans to meet with Staff to discuss the above response and answer any questions Staff may have.

WHEREFORE, Spire Missouri respectfully requests that the Commission accept this status update.

Respectfully submitted,

/s/ J. Antonio Arias

Matthew Aplington MoBar #58565
General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0785 (Office)
Email: matt.aplington@spireenergy.com

J. Antonio Arias, MoBar #74475
Counsel, Regulatory
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0655 (Office)
Email: antonio.arias@spireenergy.com

ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was serve on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 2nd day of February, 2024.

/s/ Julie Johnson
