

**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-2022-0261  
Gas Safety Found at 20 CSR 4240-40.030                    )

**REQUEST FOR ADDITIONAL TIME TO RESPOND**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”) and submits this request to the Missouri Public Service Commission (“Commission”) to allow the Company additional time to respond to Staff’s report in the above-captioned docket, stating the following:

1.        On March 29, 2022, 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 April 6, 2022, the Commission issued its order directing Staff to undertake its investigation and file progress reports on the status of its investigation.
3.        Staff filed its first progress report on October 5, 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 an inspection and issuing data requests.
4.        On January 31, 2024, Staff filed its report, which included the results of its investigation and recommendations for the Company.
5.        Spire Missouri is reviewing Staff’s report and recommendations. The Company understands that Staff will be filing a complaint, however, the Company will provide an initial response to Staff’s report. Due to the length of the report and the number of recommendations, the Company requests until March 8, 2024, to file such a response.

6. The Company conferred with Staff regarding this request, and Staff does not object to Spire Missouri filing its response by March 8, 2024.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission direct Spire Missouri to respond to Staff's report by March 8, 2024, and order any other relief as is just and reasonable.

Respectfully submitted,

*/s/ J. Antonio Arias*

---

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

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

**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 9th day of February, 2024.

*/s/ J. Antonio Arias*

---