

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

In the Matter of the Application of Spire Missouri)	
Inc. d/b/a Spire for a Permanent Waiver from the)	
Requirement to use a “device” for Overpressure)	Case No. GE-2023-0112
Protection in 20 CSR 4240-40.030 (4)(12) and (13))	
For Certain Spire East Facilities)	

FULL AND UNANIMOUS STIPULATION AND AGREEMENT

COME NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and Staff of the Missouri Public Service Commission (“Staff”) (collectively, the “Parties”), and respectfully submit this *Full and Unanimous Stipulation and Agreement*(“*Stipulation*”) to resolve the above-captioned docket, stating the following:

1. Spire Missouri filed an Application for Permanent Waiver of Compliance from Commission Rules Pertaining to Overpressure Protection on September 23, 2022. This application requested a permanent waiver from the requirements of 20 CSR 4240-40.030(4)(CC), (4)(EE)9., (4)(FF)3., (12)(M)2., and (13)(R)1.G., of the Commission’s Pipeline Safety Standards, which require adequate overpressure protection to be provided at all district regulator stations. The waiver request relates to the Company’s Reynolds regulator stations that are in use on the Company’s low-pressure system in the Greater St. Louis area. Spire Missouri is replacing the low-pressure system with an intermediate-pressure system. The intermediate-pressure system does not require Reynolds regulator stations.

2. Spire Missouri filed a Supplement to the Application on July 27, 2023.

3. Staff filed its recommendation that the Commission order Spire Missouri to take actions to comply with the Commission’s requirements set forth in 20 CSR 4240- 40.030(4)(CC), (4)(EE)9, (4)(FF)3, (12))(M)2, and (13)(R)1., and deny Spire Missouri’s Waiver request Application as filed and supplemented.

4. The Parties agree that Spire Missouri's permanent waiver request from 20 CSR 4240-40.030(4)(CC), (4)(EE)9., (4)(FF)3., (12)(M)2., and (13)(R)1.G. should be denied.

5. The Parties agree Staff will not take enforcement action specific to the non-compliance of the remaining Reynolds regulator stations with regards to 20 CSR 4240-40.030(4)(CC), (4)(EE)9., (4)(FF)3., (12)(M)2., and (13)(R)1.G. that is the subject of this docket, as long as Spire Missouri adheres to the Commission Order approving this Stipulation and completes the compliance plan detailed below.

6. The Parties agree that this Stipulation is being entered into to establish a plan to bring Spire Missouri into compliance with the requirements to provide adequate overpressure protection in 20 CSR 4240-40.030(4)(CC), (4)(EE)9., (4)(FF)3., (12)(M)2., and (13)(R)1.G.

7. The Parties agree that Spire Missouri will either abandon the Reynolds regulator stations or install temporary worker-monitor stations at the Reynolds regulator stations that cannot be abandoned.

8. The Parties agree that Spire Missouri will follow the anticipated schedule attached as **Appendix 1** for abandoning the Reynolds regulator stations or installing temporary worker-monitor stations, with an overall target completion date of December 31, 2025.

9. The Parties agree that Spire Missouri will provide quarterly updates to the Commission and Staff on the progress of the abandonments and installations.

10. Spire Missouri will notify the Commission and Staff in the event there is any overpressure event involving any of the Reynolds regulator stations.

11. In addition to the compliance plan, the Parties agree that Spire Missouri will perform the following actions to provide overpressure protection until all Reynolds regulator stations are either abandoned or have a temporary worker-monitor installed:

- a. The Company has replaced the one remaining Reynolds station that was served by an intermediate (IP) system.
- b. The Company has replaced Reynolds stations that were serving as the only pressure reduction (single feed) station into a downstream system.
- c. The Company will continue to replace in-service Reynolds stations prior to the station becoming a single feed into a downstream system.
- d. The Company will continue to follow its Low-Pressure Overpressure Protection Program, attached as **Appendix 2**;
- e. The Company will complete weekly inspections on all in service Reynolds stations to confirm stations are operating correctly and safely.
- f. The Company will complete monthly pressure and alarm testing with the control room.
- g. The Company will continue to both create individual Gas Interruption Procedures and utilize its Standard Operating Procedure for Gas Interruption and Shutdown of Main.
- h. Within 30 days of a Commission order approving this Stipulation, the Company will provide its on-site response and evaluation procedure for each high-high pressure alarm that is activated on a low pressure system.

12. The Parties advised the Office of the Public Counsel of this Stipulation, and it does not oppose this Stipulation.

GENERAL PROVISIONS OF AGREEMENT

13. This Stipulation is being entered into solely for the purpose of settling all issues in this case. Unless otherwise explicitly provided herein, none of the Parties shall be deemed to have

approved or acquiesced in any procedural principle. Except as explicitly provided herein, none of the Parties shall be prejudiced or bound in any manner by the terms of this Stipulation in this or any other proceeding. This Stipulation has resulted from extensive negotiations among the Parties, and the terms hereof are interdependent and nonseverable. If the Commission does not approve this Stipulation unconditionally and without modification, or if the Commission approves the Stipulation with modifications or conditions to which a Signatory objects, then this Stipulation shall be void and none of the Parties shall be bound by any of the agreements or provisions hereof.

14. Waiver of Procedural Rights: If the Commission unconditionally accepts the specific terms of this Stipulation without modification, the Parties waive their respective rights: (1) to call, examine and cross-examine witnesses pursuant to Section 536.070(2), RSMo.; (2) to present oral argument and/or written briefs pursuant to Section 536.080.1, RSMo.; (3) to the reading of the transcript by the Commission pursuant to section Section 536.080.2, RSMo.; (4) to seek rehearing pursuant to Section 386.500, RSMo.; and (5) to judicial review pursuant to Section 386.510, RSMo. These waivers apply only to a Commission order respecting this Stipulation issued in this above-captioned case and do not apply to any issues or matters raised in any prior or subsequent Commission order, or any issue or other matters not explicitly addressed by this Stipulation.

15. Merger and Integration: Stipulation and attached appendices contain the entire agreement of the Parties concerning the issues addressed herein. The intent of the Parties to this Stipulation has been fully and exclusively expressed in this document and attached appendices.

WHEREFORE, the Parties respectfully request that the Commission accept this Stipulation, issue an order approving the same, and order any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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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 20th day of February, 2024.

/s/ J. Antonio Arias

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