

**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 Variance of its Tariff Rules) Case No. GE-2023-0393
and Regulations for Resale of Natural Gas)

**MOTION OF THE CITY OF KANSAS CITY, MISSOURI TO
CONTACT PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
DIVISION AND TO PROVIDE INFORMATION TO PIPELINE AND HAZARDOUS
MATERIALS SAFETY ADMINISTRATION**

COMES NOW, the City of Kansas City, Missouri (“City”) and for its Motion to Contact the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) and to provide information to PHMSA, the City states as follows:

1. On December 29, 2023, Staff filed its “Staff Motion to Contact Pipeline and Hazardous Materials Safety Administration.”
2. In Paragraph No. 2 of the Staff Motion, the Staff states that the City previously stated that the City must adhere to the PHMSA rules. The City notes that the statement of Staff is an incorrect recitation of the position of the City.
3. In fact, the position of the City is that the PHMSA regulations regarding master metering are not applicable to the City in the circumstances described in this Docket.
4. The City has stated that, to the best of its knowledge and based on the professional opinions of its engineering and construction contractors, that the City master metering and pipeline facilities are in full compliance with any and all applicable state and local regulations.

5. The City requests the Commission grant the City’s Motion herein, and permit the City to contact PHMSA to provide factual information and documentation that would assist PHMSA in its determination.

WHEREFORE, the City prays the Commission will accept this Motion and provide the relief requested herein, and such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ James P. Zakoura

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of March 2024, the foregoing pleading was electronically filed with the Missouri Public Service Commission and that one copy was delivered electronically to all parties as follows:

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/s/ James P. Zakoura

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