

**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)

RESPONSE TO STAFF REPORT

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”) and submits this Response to the Staff Report, filed with the Missouri Public Service Commission (“Commission”) on January 31, 2024, 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 related to timely responses to excavator requests for utilities to mark the location of underground facilities.
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. On February 9, Spire Missouri filed a request to respond to Staff’s report and recommendations by March 8, 2024, which the Commission granted.

RESPONSE

6. Spire Missouri acknowledges the difficulties in maintaining a high on-time-performance in responding to locate requests and has been evaluating and taking actions to increase its locate timeliness. This includes the addition of a second locate vendor in Spire Missouri East, which has increased locate timeliness. The Company's expectation is to respond to all locate requests within the time required by statute and Commission rule, and it appreciates Staff's recommendations in working to meeting this expectation. Spire Missouri generally agrees with Staff's recommendations, and provides the specific responses below:

7. **Staff Recommendation 1:** The Company is generally in agreement with this recommendation and has been evaluating contractor staffing levels throughout its territories. One such action as a result of this evaluation is expanding the territory covered by its second vendor in Spire Missouri East. The Company has also started training its own personnel to perform the locates of the Company's own facilities.

8. **Staff Recommendation 2:** The Company agrees with this recommendation.

9. **Staff Recommendation 3:** The Company agrees with this recommendation.

10. **Staff Recommendation 4:** The Company agrees with this recommendation and looks forward to holding further discussions with Staff to ensure the developed plan meets Staff's expectations.

11. **Staff Recommendation 5:** The Company agrees with this recommendation.

12. **Staff Recommendation 6:** The Company agrees with this recommendation.

13. **Staff Recommendation 7:** The Company agrees with this recommendation.

14. **Staff Recommendation 8:** The Company agrees with this recommendation.

15. **Staff Recommendation 9:** The Company agrees to include failure to timely locate facilities as a specific category of root cause description of an excavation damage event in its procedures. The Company currently records such damage events under the category “Not Marked Due to No Response.”

16. **Staff Recommendation 10:** The Company has not stopped tracking and recording damage caused by failure to timely locate its facilities and agrees with this recommendation.

WHEREFORE, Spire Missouri respectfully requests that the Commission accept this Response to the Staff Report and order any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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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 8th day of March, 2024.

/s/ J. Antonio Arias
