

In the Matter of an Investigation into)
City Utilities of Springfield Plastic Pipe)
Failures and the Adequacy of its Leak) **Case No. GS-2004-0257**
Survey Procedures, Installation)
Procedures and Replacement Criteria)

COMES NOW the Staff of the Missouri Public Service Commission and files its report regarding its ongoing investigation into plastic pipe leaks caused by rock impingement and City Utilities of Springfield's ("City Utilities") plastic pipe replacement program, and in support states as follows:

2. In 2016, City Utilities proposed to change its reporting period from a calendar year basis to an October through September annual reporting basis corresponding with City Utilities' fiscal year to allow for more efficient scheduling of replacement projects. The Commission granted this change in the reporting period on May 31, 2016.

3. On February 3, 2022, the Commission ordered Staff to file a Status Report no later than March 31, 2022, and on March 31, 2022, Staff filed its Status Report with the Commission.

4. On March 18, 2024, the Commission ordered Staff to file a Status Report regarding the completion of the City of Springfield's plastic main and service line replacement program and whether this case should be closed. The Commission Ordered Staff to file said report no later than April 18, 2024.

5. Attached hereto and incorporated herein by this reference is Staff's ninth Status Report, which provides a summary of City Utilities' progress from October 1, 2021 through September 2023.

6. The City Utilities has provided its monthly updates to Staff for calendar years 2021, 2022, and 2023, but Staff has not received the City's monthly updates for January 2024, February 2024, and March 2024. Moreover, Staff has not received City Utilities semi-annual reports for the periods of April 1, 2022 through September 30, 2022; October 1, 2022 through September 30, 2023; and October 1, 2023 through March 31, 2024. City Utilities has stated and Staff agreed that putting the delinquent semi-annual reports covering the time periods of April 1, 2022 through September 30, 2023 into one report would be best.

7. As part of Staff's ninth Status Report, Staff asks the Commission to order City Utilities to provide the aforementioned combined report and monthly reports by no later than May 17, 2024, and Staff will review the reports for consistency with the results provided by City Utilities and quoted in detail in the attached Status Report.

8. Staff has been and will continue to monitor the effectiveness of City Utilities' plastic main and service line replacement program and leak surveys. If at any time Staff determines that the program requirements should be enhanced or if there are any inconsistencies in the reports addressed above, Staff will file an amended Status Report at that time.

WHEREFORE, Staff requests the Commission accept Staff's Status Report attached hereto, and Order the City Utilities to: provide a combined report that includes the periods of April 1, 2022 through September 30, 2023; provide monthly reports for January, February, and March 2024 by May 17, 2024; and grant such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 18th day of April, 2024.

/s/ J. Scott Stacey