

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

In the Matter of the Application of Spire Missouri)
Inc. for a Variance of its Tariff Rules and) Case No. GE-2023-0393
Regulations for Resale of Natural Gas)

**SUBMISSION OF THE CITY OF KANSAS CITY, MISSOURI
TO STAFF'S SUBMISSION OF PHMSA RESPONSE**

COMES NOW the City of Kansas City, Missouri (“City”) and for and in response to Staff, states as follows:

1. On June 11, 2024, the Staff of the Missouri Public Service Commission filed Staff’s Submission of PHMSA Response.
2. On June 11, 2024, the Missouri Public Service Commission filed its Order Setting Time for Responses to PHMSA Response. In such Order, the Commission permitted any party to respond to the PHMSA Response on or before June 21, 2024.

3. On June 12, 2024, the firm of Clark/Weitz/Clarkson stated as follows:

You requested that CWC confirm that the design and construction of the natural gas was in compliance with applicable regulations and was tested as to its safety and integrity – and passed all such tests – prior to placement into commercial use.

Attached to this letter is a compilation of the responses that we have shared previously on this subject including a letter from Henderson Engineers confirming the design of the gas service and a statement from Taliaferro & Browne regarding their involvement in the design. These documents are bookmarked in the attached file. Also included are the responses from US Engineering to the Data Request from PSC. With this information, CWC finds and confirms that the design and construction of the gas service was in compliance with the Development Agreement and applicable regulations, and was properly tested, prior to placement into commercial use.

4. The City files herewith the 278 pages provided by CWC that demonstrates compliance with applicable regulations. The “public” portion of the Exhibits are designated as Attachment I. One portion of such filed materials, that being the Agreement between US

Engineering and Henderson Engineers as confidential and exempt from disclosure as proprietary commercial information which is designated as Attachment II.

WHEREFORE, the City respectfully requests that the Commission accept this Submission and the Exhibits submitted therewith.

Respectfully submitted,

/s/ James P. Zakoura

James P. Zakoura, MO 66799

Special Counsel

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Attorneys for the City of Kansas City, Missouri

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF JOHNSON)

James P. Zakoura, being duly sworn upon his oath, deposes and states that he is the Attorney for The City of Kansas City, Missouri, that he has read and is familiar with the foregoing *Submission of the City of Kansas City, Missouri to Staff's Submission of PHMSA Response*, and that the statements therein are true to the best of his knowledge, information, and belief.



James P. Zakoura

SUBSCRIBED AND SWORN to before me this 19th day of June 2024.



Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June 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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