

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

In the Matter of the Proposed Amendment)	
of the Commission’s Rule Relating to)	Case No. GX-2024-0337
20 CSR 4240-10.030 Standards of Quality)	

SPIRE MISSOURI INC.’S INITIAL COMMENTS

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and respectfully submits the following comments on the Proposed Amendment to 20 CSR 4240-10.030 (the “Proposed Amendment”) published by the Missouri Public Service Commission (“Commission”). On May 1, 2024, the Commission filed notice of the above captioned docket. On May 15, 2024, the Commission issued its finding that the Proposed Amendment is necessary to protect the public interest and to carry out the purposes of the statute that granted the rulemaking authority. The Commission also ordered its Secretary to file the Proposed Amendment with the Secretary of State for publication in the Missouri Register. On May 23, 2024, the Commission issued its *Notice of Hearing and Comment Period*, directing interested stakeholders to file comments no later than July 17, 2024, and scheduled a public hearing for July 23, 2024. Spire Missouri now provides the below initial comments on the Proposed Rule:

1. **20 CSR 4240-10.030 (11)** states, “Each gas utility...shall provide, install, operate, maintain and continuously monitor sensors and testing equipment to determine if the quality of manufactured gas and RNG meets the requirements of section (10) of this rule.” From its experience, research and consultation with others, the Company wants to note that not all constituents contained in RNG are continuously monitored. This is because not all constituents found in RNG are present in every RNG feedstock. Constituents that are common practice to be continuously monitored in RNG include BTU value, Wobbe Index, methane content, temperature, hydrocarbon dew point, liquids, N₂, CO and CO₂, & O₂. Additional analyzers are often installed for specific constituents, such as H₂O, siloxanes and H₂S. Other constituents monitored, such as halogens and vinyl chloride,

are analyzed in a lab through reoccurring, periodic sampling submissions, but these are constituents that may not be found in every RNG feedstock.

2. Spire also wants to note that the hydrogen parameter found in **20 CSR 4240-10.030 (10) (E)** is not necessary and proposes to remove that requirement. This is a gas constituent that may be monitored based on the feedstock of the RNG, but monitoring is not always necessary. Additionally, there is an acceptable range of H₂ levels that would still ensure safe operation and meet the BTU content requirement specified in **20 CSR 4240-10.030 (10) (A)**. The Company has observed multiple interstate pipelines that serve Missouri, that do not specify H₂ limits in their tariffs. Finally, **20 CSR 4240-40.100** allows a utility's Renewable Natural Gas Program to potentially include hydrogen gas, presumably at levels greater than those currently listed in **20 CSR 4240-10.030 (10) (E)** as currently proposed.

WHEREFORE, Spire Missouri respectfully requests that the Commission accept these comments.

Respectfully submitted,

/s/ J. Antonio Arias

Matthew Aplington, MoBar #58565
General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0785 (Office)
Email: matt.aplington@spireenergy.com

Sreenivasa Rao Dandamudi, MoBar #50734
Director and Associate General Counsel - Regulatory
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0702 (Office)
Email: sreenu.dandamudi@spireenergy.com

J. Antonio Arias, MoBar
#74475 Senior Counsel,
Regulatory Spire Missouri
Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0655 (Office)
Email: antonio.arias@spireenergy.com

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent either by mail or electronic mail to all parties of record on this 17th day of July, 2024.

/s/ J. Antonio Arias

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