

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

In the Matter of an Investigation into )  
Spire Missouri Inc. d/b/a Spire )  
Concerning a Natural Gas Incident In ) **File No. GS-2025-XXXX**  
Independence, Missouri )

**STAFF’S MOTION TO ESTABLISH A CASE**

**COMES NOW** the Staff of the Missouri Public Service Commission (hereafter the “Staff” or Commission”), by and through counsel, and for its Motion to Establish a Case states as follows:

1. Pursuant to Section 386.310 of the Revised Statutes of Missouri (“RSMo”), the Commission has the authority to require every gas utility, including municipal gas systems, to operate its system in a manner that promotes and safeguards the health and safety of its employees, customers, and the public.

2. The Commission has jurisdiction to regulate gas pipeline safety under Section 386.310, RSMo.

3. A public utility that owns any gas plant is subject to the provisions of Section 386.572, RSMo., for violation of any law, order, decision, decree, rule, direction, demand, or requirement of the Commission. § 386.572, RSMo.

4. Spire Missouri Inc. d/b/a Spire (“Spire”) is a public utility under Section 386.020, RSMo.

5. Spire Missouri owns and operates a gas plant and is subject to the provisions of Section 386.572, RSMo.

6. The monetary penalties for violations of such gas safety standards are set forth in Sections 386.572.2 and .3, RSMo and are considered “separate and distinct

offenses, regardless of whether such violations relate to the same incident. In the case of a continuing violation, each day's continuance thereof shall be a separate and distinct offense."

7. A reportable natural gas incident occurred on Monday, August 26, 2024, in Independence, Missouri, an area served by Spire. A third-party excavator installing fiber optic cable by directional drilling hit a sewer lateral to the house located at 426 E. Fair Street, and Spire's nearby 4-inch natural gas main. Natural Gas migrated into the house, and ignited, resulting in an explosion and house fire.

8. A Safety Engineering Department Staff member visited the site location August 27, 2024, to discuss the work being performed and events leading up to the incident. Staff intends to further investigate the actions of the excavator to request facility locations and Spire's actions to timely and accurately locate its gas facilities.

9. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Department.

10. Staff further recommends the Commission direct that the report, or a status report, be filed by December 13, 2024.

**WHEREFORE**, for the reasons set forth above, Staff respectfully requests the Commission establish a case for the purpose of receiving a report, or status report, as described herein, and for any other such orders and relief as it deems just and appropriate under the circumstances.

Respectfully submitted,

**/s/ J. Scott Stacey**

J. Scott Stacey

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**Attorney for Staff of the  
Missouri 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 28<sup>th</sup> day of August, 2024.

**/s/ J. Scott Stacey**