

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

Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
)	
v.)	File No. GC-2024-0260
)	
Spire Missouri Inc. d/b/a Spire,)	
)	
Respondent)	

ANSWER

COMES NOW Spire Missouri Inc. (“Respondent”) and respectfully submits its *Answer* to the formal complaint in the above-captioned docket, stating the following:

1. Respondent affirms that the subject of the complaint is accurately stated in Paragraph 1.
2. Respondent affirms that Complainant is Staff of the Missouri Public Service Commission as stated in Paragraph 2.
3. Respondent affirms that Respondent is Spire Missouri Inc., and Respondent is accurately described in Paragraph 3.
4. Respondent affirms that it is subject to the jurisdiction of the Missouri Public Service Commission (“Commission”) and the statutes applicable to the Commission described in Paragraph 4.
5. Respondent affirms that the Commission’s authority is accurately described in Paragraph 5.
6. Respondent affirms that the Commission’s authority is accurately described in Paragraph 6.

7. Respondent affirms that the Commission's authority is accurately described in Paragraph 7.

8. Respondent affirms that the Commission's authority is accurately described in Paragraph 8.

9. Respondent affirms that the Commission's authority is accurately described in Paragraph 9.

10. Respondent affirms that the Commission's authority is accurately described in Paragraph 10.

11. Respondent affirms that the Commission's authority is accurately described in Paragraph 11.

12. Respondent admits the allegations in Paragraph 12.

13. Respondent admits the allegations in Paragraph 13.

14. Respondent admits the allegations in Paragraph 14.

15. Respondent admits the allegations in Paragraph 15.

16. Respondent admits the allegations in Paragraph 16.

17. Respondent admits the allegations in Paragraph 17.

18. Respondent admits the allegations in Paragraph 18.

19. Respondent admits the allegations in Paragraph 19.

20. Respondent admits the allegations in Paragraph 20.

21. Respondent admits the allegations in Paragraph 21.

22. Respondent admits the allegations in Paragraph 22.

23. Respondent admits the allegations in Paragraph 23.

24. Respondent admits the allegations in Paragraph 24.

25. Respondent admits the allegations in Paragraph 25.

26. Respondent admits the allegations in Paragraph 26.

27. Respondent admits the allegations in Paragraph 27.

28. Respondent admits the allegations in Paragraph 28. Respondent provides the following brief responses to Staff's recommendations.

29. **Recommendation 1.** Respondent agrees with this recommendation.

30. **Recommendation 2.** Respondent agrees with this recommendation and has been developing sampling program with Staff input to meet this recommendation.

31. **Recommendation 3.** Respondent agrees with this recommendation.

32. **Recommendation 4.** Respondent agrees with this recommendation.

33. **Recommendation 5.** Respondent will implement the tracking and monitoring recommended by Staff and will include incorrect operation as a consideration in tracking and analysis of leaks that have the cause of "other" on these newly installed facilities that are replaced without exposing.

34. **Recommendation 6.** Respondent understands Staff's rationale behind this recommendation and proposes to implement an accelerated leak surveying program if, through the sampling program, Respondent and Staff determine that the joints in question are leaking due to being completed by a joiner during a time interval in which the joiner had not been requalified within 15 months. If an accelerated leak surveying program is implemented, Respondent proposes that the program continue until further risk of leaks from the joints in is negligible.

35. **Recommendation 7.** Respondent agrees with this recommendation.

36. **Recommendation 8.** Respondent agrees with this recommendation. Respondent has an open field on leak orders that allows technicians to provide more information when a leak

may have special circumstances associated with the selected leak cause. Respondent will retrain technicians on adding detail as appropriate. For leaks on newly installed facilities that are repaired by replacement and are not exposed, Respondent agrees with Staff that there are benefits to completing an additional investigation of those occurrences. Respondent does not and will not repair by replacement all leaks on newly installed facilities, therefore a sample of newly installed facilities are anticipated to be exposed and investigated for a specific cause.

37. **Recommendation 9.** Spire agrees with this recommendation.

FURTHER ANSWER

38. While Respondent does not dispute the allegations in Staff's complaint, Respondent would note the circumstances of the alleged violations, including the alleged violation that joiners were not requalified within the time allowed by the Commission's rules. The joiners in question were all qualified prior to this incident, no joiner was unqualified longer than approximately eight months, and the average length that a joiner was unqualified was approximately three months. During the requalification of all joiners, which took no more than two months to accomplish, no joiner failed to become requalified. Additionally, this incident occurred during the COVID-19 Pandemic, when Respondent, like many companies across the country, was navigating novel public health requirements while maintaining the business operations necessary to continue providing a vital service to our customers.

WHEREFORE, Respondent respectfully requests that the Commission accept this Answer, decline seeking penalties in this case in light of the circumstances discussed above, 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 either by mail or electronic mail to all parties of record on this 15th day of November, 2024.

/s/ J. Antonio Arias

J. Antonio Arias