



4. On March 27, 2024, the Commission ordered Staff to file either a report regarding its investigation, or a report on the investigation's progress, no later than May 17, 2024.

5. On May 17, 2024, the Commission ordered Staff to file either a report regarding its investigation, or a report on the investigation's progress, no later than August 9, 2024.

6. On August 7, 2024, the Staff filed a status report requesting through September 20, 2024, to file a report regarding its investigation or a report on the progress of Staff's investigation.

7. On September 20, 2024, Staff filed a status report on the progress of its investigation.

8. On September 20, 2024, the Commission ordered Staff to either file its investigation report or a report on the status of Staff's investigation no later than November 1, 2024.

9. Staff completed its discovery and provided a draft of the facts section to Spire for identification of confidential information and feedback of factual accuracy. Staff received Spire's feedback on October 29, 2024.

10. On October 31, 2024, Staff filed a status report asking for additional time to review Spire's feedback before finalizing its investigation report.

11. On October 31, 2024, the Commission granted Staff's request and ordered Staff to either file its investigation report or a report on the status of Staff's investigation no later than November 27, 2024.

12. Based on Staff's investigation, Staff submits the attached Staff's Gas Incident Report and Appendices A-E, incorporated by reference herein, as Ordered by the Commission.

13. Staff has identified violations of the Commission's pipeline safety standards as promulgated in 20 CSR 4240-40.030 and 20 CSR 4240-40.080 that are set out in Staff's Gas Incident Report, which warrant the filing of a Complaint against Spire. The Gas Incident Report also sets out recommendations related to the violations of the Commission's pipeline safety standards as set forth in 20 CSR 4240-40.030 and 20 CSR 4240-40.080, and a potential violation of Section 327.181, RSMo. Staff will address these violations and recommendations in the Complaint addressed above.

14. Staff also requests Commission approval for Staff to refer this matter to the Missouri State Board of Architects, Professional Engineers, Professional Land Surveyors, and Professional Landscape Architects ("APEPLSPLA"), for APEPLSPLA determination of violations of Section 327.181, RSMo.

**WHEREFORE**, Staff respectfully submits and requests the Commission accept the attached Staff's Gas Incident Report and Appendices A-E pursuant to the Commission's Order issued on October 31, 2024, approve Staff to refer this matter to APEPLSPLA for violation determination of Section 327.181, RSMo, and grant such other and further relief as the Commission deems just in the circumstances. Staff intends to follow-up this filing with the filing of a Complaint against Spire, which will contain Staff recommendations in addition to identifying and addressing violations of Commission pipeline safety rules.

Respectfully submitted,

**/s/ J. Scott Stacey**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 27<sup>th</sup> day of November, 2024.

**/s/ J. Scott Stacey**