

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

The Staff of the Missouri Public Service,)
Commission,)
)
Complainant,)
v.)
)
Spire Missouri Inc., d/b/a Spire)
)
Respondent.)

File No. GC-2024-0260

STAFF’S RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through Staff Counsel’s Office, and in response to the Commission’s November 26, 2024, *Order Directing Staff Response* states:

1. On March 25, 2024, Staff filed a *Complaint* against Spire Missouri, Inc. d/b/a Spire (“Spire” or “Spire Missouri”), a regulated provider of natural gas service in Missouri. Staff contends that Spire violated certain sections of the Commission’s Gas Pipeline Safety Rule, 20 CSR 4240-40.030, with respect to the failure to requalify employees on applicable plastic pipe joining procedures within fifteen (15) months in 2020, to install plastic pipe joints in accordance with Spire’s procedures, and to investigate a plastic pipe joint failure in accordance with Spire’s procedures.

2. On March 28, 2024, the Commission ordered Spire Missouri to file an Answer to Staff’s *Complaint* no later than April 29, 2024.

3. Spire Missouri filed seven Requests for Additional Time to file an Answer to Staff's *Complaint*; wherein, the Commission granted said requests up to and including November 1, 2024. The Commission ordered Spire Missouri to file its Answer to Staff's *Complaint* no later than November 15, 2024.

4. On November 15, 2024, Spire Missouri filed its Answer to Staff's *Complaint*.

5. On November 26, 2024, the Commission issued an Order Directing Staff Response no later than December 10, 2024, on how Staff would like the Commission to proceed in this matter.

6. Based on Staff's review of Spire's Answer to Staff's *Complaint*, Staff submits the attached Staff Memorandum, incorporated by reference herein, as Ordered by the Commission.

7. Staff's Memorandum reiterates its recommendations set forth in the *Complaint* and indicates which recommendations both parties agree to and the ones that are still at issue. The Staff Memorandum further provides its reasoning why the non-agreed to recommendations are warranted in evaluating the potential public safety risks associated with the installed joints, and to prevent recurrence of the violations.

8. Staff and Spire appear to be in agreement generally and with that, further discussions may facilitate an agreement on the remaining issues; however, there are some issues as outlined in Staff's Memorandum that need to be addressed or clarified by Spire Missouri before an agreement can be reached.

WHEREFORE, Staff respectfully submits and requests the Commission accept the attached Staff's Response pursuant to the Commission's Order issued on November 26, 2024, and grant such other and further relief as the Commission deems just in the circumstances. Staff intends to follow-up this filing with either a Stipulation and Agreement or a Motion to set a procedural conference.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
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 9th day of December, 2024.

/s/ J. Scott Stacey