

**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) **File No. GS-2024-0137**
Natural Gas Incident in Holt, Missouri)

INVESTIGATION REPORT RESOLUTION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, in response to the Commission’s February 27, 2025, *Order Directing Extending Time For Report*, and for its Status Report states:

1. On February 13, 2025, the Missouri Public Service Commission (“Commission”) ordered Staff and Spire Missouri Inc. d/b/a Spire (“Spire”) to file a joint status report by February 28, 2025.

2. On February 27, 2025, Staff filed a Status Report requesting an extension to March 14, 2025, in order to allow the parties to discuss and finalize resolution of the remaining issue in recommendation twelve.

3. The parties (“Staff and Spire”) have met and discussed resolution of the final issue within this matter, and have come to a final resolution. The parties agree that the attached letter to be sent to the Board for Architects, Professional Engineers, Professional Land Surveyors and Professional Landscape Architects (“APEPLSPLA”, or “The Board”) for consideration resolves the issue in Staff’s recommendation number twelve.

4. On March 3, 2025, Staff filed its Complaint against Spire in regards to this investigation case with the Commission on March 3, 2025, Case Number GC-2025-0241. Staff’s Complaint contained the same recommendations, with the exception of Recommendation number twelve to be resolved within this matter, and addressed the violations of Commission pipeline safety rules.

5. The parties agree that this investigation case has been resolved through the filing of the Complaint and resolution of recommendation number twelve through the attached letter to the Board. The parties further agree that this matter, GS-2024-0137, may be closed, as final resolution of the violations and recommendations through a stipulation and agreement will be forthcoming in Case No. GC-2025-0241.

WHEREFORE, for the above-stated reasons, Staff respectfully requests the Commission accept this Investigation Report Resolution, order Staff to send the attached letter to the Board, and close the investigation case as the Complaint case has been filed, and to grant such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey

Deputy Counsel

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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 13th day of March, 2025.

/s/ J. Scott Stacey



Missouri Public Service Commission

MAIDA J. COLEMAN
Commissioner

KAYLA HAHN
Chair

VACANT
Commissioner

GLEN KOLKMEYER
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JOHN P. MITCHELL
Commissioner

March 13, 2025

Missouri Board for Architects, Professional Engineers, Professional Land Surveyors and Professional Landscape Architects
3605 Missouri Boulevard, Suite 380
Jefferson City, MO 65109

Subject: Request for Legal Interpretation

The Staff of the Missouri Public Service Commission (“Staff”) investigates utility infrastructure incidents.¹ Staff recently completed and filed its investigation report pertaining to an incident involving utility infrastructure that occurred in 2023. The incident occurred as a utility contractor's employees were installing a replacement segment of pipeline, and resulted in an injury to an employee of the utility contractor. The work was being performed on property that was not owned by the utility. The utility's design documents issued for construction on this project were reviewed by utility staff who hold undergraduate engineering degrees, but were not approved or stamped by a licensed professional engineer. The Commission’s pipeline safety standards in 20 CSR 4240-40.030 are silent regarding licensure of pipeline designers. The Commission has authorized Staff to refer the matter of whether or not chapter 327, RSMo., with respect to utility pipeline design, requires a stamp from a professional engineer, to the Missouri Board for Architects, Professional Engineers, Professional Land Surveyors and Professional Landscape Architects (“APEPLSPLA” or “Board”).

Specifically:

¹ Staff investigate both federal incidents as defined in 20 CSR 4240-40.020(2)(D) and Missouri incidents as defined in 20 CSR 4240-40.020(4).

1. How are the requirements of chapter 327 RSMo applicable to the design of a natural gas pipeline²?
2. In what circumstances, if any, must the design of natural gas pipelines be sealed by a licensed professional engineer?

Staff would appreciate guidance from the Board on this matter.

Please refer technical questions to Kathleen McNelis at (573) 751-3456 or via email at Kathleen.McNelis@psc.mo.gov; and legal questions to Scott Stacey at (573) 522-6279 or via email at Scott.Stacey@psc.mo.gov.

Sincerely,

J. Scott Stacey
Deputy Counsel
Staff Counsel's Office
Missouri Public Service Commission

² Pipeline is defined in 20 CSR 4240-40.030(1) as all parts of those physical facilities through which gas moves in transportation including pipe, valves and other appurtenances attached to the pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.