



Stipulation and Agreement by no later than April 9, 2025. The *Order* also directed Staff to make an additional recommendation on whether the file may be closed.

5. As discussed in the Staff's Memorandum ("Memorandum"), attached hereto as Appendix A and incorporated by reference, Staff has reviewed Spire's *Compliance Filing* and procedures submitted by Spire to Staff through email, and agrees that Spire's documents state it has complied with Paragraphs 6 – 11 of the Stipulation and Agreement.

6. As further stated in Staff's Memorandum, Paragraph 12 of the *Stipulation and Agreement* requires that Spire will demonstrate completion of each action within 90 days of a Commission order approving this Stipulation. Staff agrees that Spire's email of March 6, 2025, containing procedure modifications demonstrates compliance with paragraphs 6-8 and 10 of the *Stipulation and Agreement*. With respect to Paragraphs 9 and 11 of the *Stipulation and Agreement*, Staff will review records to demonstrate completion of each action in routine safety inspections going forward.

7. For these reasons, as more fully explained in Staff's Memorandum, Staff agrees Spire is in compliance with Paragraphs 6-11 of the Stipulation and Agreement, and recommends approval of its Compliance Filing.

8. Staff further recommends that the case be closed, with the provisions that:

- a. If Spire finds that locates are not being performed within the requirements of Section 319.030, of the Revised Statutes of Missouri ("RSMo"), that Spire reopen the case by filing necessary amendments or supplements to Appendix 1 of the *Stipulation and Agreement*; and

b. If Staff finds during routine safety inspections that the provisions of the *Stipulation and Agreement* have not been complied with, Staff will file a motion to reopen the case.

**WHEREFORE**, Staff submits its Staff Recommendation and Memorandum that Spire is in compliance with Paragraphs 6-11 of the *Stipulation and Agreement* and for the reasons stated above and in Staff's Memorandum, Staff recommends the Commission issue an Order approving Spire's Compliance Filing; close this case file subject to Paragraph 8 above; and for any other relief that is just and reasonable under the circumstances.

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 9<sup>th</sup> day of April, 2025.

**/s/ J. Scott Stacey**

## MEMORANDUM

**TO:** Missouri Public Service Commission  
Official Case No. GC-2024-0305  
Spire Missouri, Inc., d/b/a Spire

**FROM:** Safety Engineering Department  
John D. Kottwitz, Associate Engineer  
Greg A. Williams, Associate Engineer  
Kathleen A. McNelis, PE, Engineer Manager

/s/ Kathleen A. McNelis, PE 04/11/2025  
Safety Engineering Department/ Date

**SUBJECT:** Staff's Recommendation in the Matter of The Staff of the Missouri Public Service Commission, Complainant, v. Spire Missouri Inc., d/b/a Spire, Respondent.

**DATE:** April 11, 2025

Staff filed its *Complaint* in this Case on April 16, 2024. In its *Complaint*, Staff asserted one violation of Commission rules,<sup>1</sup> provided ten numbered recommendations to Spire Missouri, Inc. ("Spire"),<sup>2</sup> and a final unnumbered recommendation that the Commission order Spire to file an action plan to address the numbered recommendations.<sup>3</sup> Staff's recommendations to Spire were numbered A-J in Count II of the *Complaint*.

On November 14, 2024, Staff and Spire filed a *Stipulation and Agreement*, which was approved by Commission Order on December 12, 2024.

To address Staff Recommendations A-D in Count II of the *Complaint*, the *Stipulation and Agreement* included a plan<sup>4</sup> to be implemented by Spire, and an agreement that Spire will amend or supplement the plan as needed if locates are not being performed within the requirements of Section 319.030 RSMo.<sup>5</sup> To date, no amendments or supplements have been submitted.

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<sup>1</sup> Count I on page 7 of Complaint.

<sup>2</sup> Count II, items numbered A through J on pages 8-10 of Complaint.

<sup>3</sup> Count II, item numbered K on pages 10-11 of Complaint.

<sup>4</sup> See Numbered Paragraph 4 and Appendix 1 of the November 14, 2024 *Stipulation and Agreement*.

<sup>5</sup> See Numbered Paragraph 5 of the November 14, 2024 *Stipulation and Agreement*.

To address Staff Recommendations E-J in Count II of the *Complaint*, the *Stipulation and Agreement* included agreement that Spire would take additional actions listed in numbered Paragraphs 6-11 of the *Stipulation and Agreement*, and that for the actions described in Paragraphs 6-11, Paragraph 12 states that Spire would demonstrate completion of each action described in Paragraphs 6 through 11 within 90 days of a Commission order approving the *Stipulation and Agreement*.

On March 3, 2025, Spire submitted a *Compliance Filing*, addressing actions taken for each of the actions listed in Paragraphs 6-11 of the *Stipulation and Agreement*. For the actions that required creation or modification of existing procedures, Spire provided copies of procedure modifications to Staff by email on March 6, 2025.

On March 11, 2025, the Commission ordered Staff to file a recommendation, or a status report stating when it expects to file a recommendation, regarding Spire's *Compliance Filing* and whether Spire has complied with Paragraphs 6 through 11. In addition, Staff was ordered to make a recommendation on whether the file may be closed.

Staff has reviewed Spire's *Compliance Filing* and the procedures submitted by Spire to Staff by email. Staff agrees that Spire's *Compliance Filing* documents that Spire states that it has complied with Paragraphs 6 through 11 of the *Stipulation and Agreement*.

Paragraph 12 of the *Stipulation and Agreement* requires that Spire will demonstrate completion of each action within 90 days of a Commission order approving this Stipulation. Staff agrees that Spire's email of March 6, 2025, containing procedure modifications demonstrates compliance with Paragraphs 6-8 and 10 of the *Stipulation and Agreement*. With respect to

Paragraphs 9 and 11 of the *Stipulation and Agreement*, Staff will review records to demonstrate completion of each action in routine safety inspections going forward.

Staff recommends that the case be closed, with the provisions that 1. If Spire finds that locates are not being performed within the requirements of Section 319.030 RSMo, that Spire reopen the case by filing necessary amendments or supplements to Appendix 1 of the *Stipulation and Agreement*, and 2. If Staff finds during routine safety inspections that the provisions of the *Stipulation and Agreement* have not been complied with, Staff will file a motion to reopen the case.



