

**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 Natural Gas Incident In )  
 Kansas City, Missouri )

**File No. GS-2025-XXXX**

## **STAFF'S MOTION TO ESTABLISH A CASE**

**COMES NOW** the Staff of the Missouri Public Service Commission (hereafter the “Staff” or Commission”), by and through counsel, and for its Motion to Establish a Case states as follows:

1. Pursuant to Section 386.310 of the Revised Statutes of Missouri (“RSMo”), the Commission has the authority to require every gas utility, including municipal gas systems, to operate its system in a manner that promotes and safeguards the health and safety of its employees, customers, and the public.

2. The Commission has jurisdiction to regulate gas pipeline safety under Section 386.310, RSMo.

3. A public utility that owns any gas plant is subject to the provisions of Section 386.572, RSMo., for violation of any law, order, decision, decree, rule, direction, demand, or requirement of the Commission. § 386.572, RSMo.

4. Spire Missouri Inc. d/b/a (“Spire”) is a public utility under Section 386.020, RSMo.

5. Spire owns and operates a gas plant and is subject to the provisions of Section 386.572, RSMo.

6. The monetary penalties for violations of such gas safety standards are set forth in Sections 386.572.2 and .3, RSMo, and are considered “separate and distinct

offenses, regardless of whether such violations relate to the same incident. In the case of a continuing violation, each day's continuance thereof shall be a separate and distinct offense."

7. A reportable natural gas incident<sup>1</sup> occurred on Tuesday, April 22, 2025, in the 9500 block of Grandview Road in Kansas City, Missouri, an area served by Spire. A third-party excavator damaged a high pressure 10-inch steel gas main. Spire personnel responded to investigate and repair the damage, and reported that as a result of a flash fire, one employee was injured.

8. A Safety Engineering Department Staff member visited the incident location on April 22 and 23, 2025, to observe locate markings and Spire's emergency response efforts including work to repair the pipeline. Staff intends to further investigate Spire's damage prevention and emergency response procedures and actions for compliance with applicable federal and state pipeline safety standards.

9. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Department.

10. Staff further recommends the Commission direct that the report, or a status report, be filed by September 30, 2025.

**WHEREFORE**, for the reasons set forth above, Staff respectfully requests the Commission establish a case for the purpose of receiving a report, or status report, as described herein no later than September 30, 2025, and for any other such orders and relief as it deems just and appropriate under the circumstances.

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<sup>1</sup> See 20 CSR 4240-40.020(3) ad (4) for reporting requirements.

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 23rd day of April, 2025.

**/s/ J. Scott Stacey**