BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc. d/b/a Spire's	)	
Request for Authority to Implement a General	)	
Rate Increase for Natural Gas Service Provided	)	File No. GR-2025-0107
In the Company's Missouri Service Areas	)	

RESPONSE TO OFFICE OF THE PUBLIC COUNSEL
DATA REQUEST(S) 1200-1215

Spire Missouri Inc. ("Spire") received data request(s) 1200-1215 from the Office of the Public Counsel on April 21, 2025, with a due date of May 11, 2025. Spire provides the following responses to data request(s) 1200-1215 as follows. For convenience, Spire includes each data request followed by Spire's response.

DR 1200
Please provide copies of all internal analysis, memos, presentations, and/or board materials that discuss the anticipated Leak Detection and Repair ("LDAR") rule and its expected impact to Spire Missouri.

Response:
Please see the attached Confidential files. These files are confidential 20 CSR 4240-2.135(2)(A)5.

Signed by: David Yonce

DR 1201
Please provide copies of any correspondence between the Company and United States Department of Transportation's Pipeline and Hazardous Materials Safety Administration ("PHMSA") or other regulatory bodies regarding the anticipated LDAR rule.

Response:
The Company submitted the attached comments to the LDAR Notice of Proposed Rulemaking on August 16, 2023.

Signed by: David Yonce

DR 1202
Please decried in detail any proactive steps the Company has taken in anticipation of the LDAR rule, including timelines and rationale.

Response:
Beginning in 2023, Spire undertook two proactive paths of work in anticipation of the LDAR rule.

First, Spire participated in reviews of and responses to the proposed rule's content through its involvement with the American Gas Association (AGA), including a working committee to assist in preparing comments to the proposed rule. The Company also began reviewing various aspects of the rule internally, including the consideration of advanced leak detection and other aspects of the rule including the new leak grade definition plus leak recheck timelines. Spire submitted comments to the proposed rule and also supported the industry comments submitted by AGA. Throughout 2024, the Company monitored the progress of the proposed rule and continued to execute the RFP process (described below) to select a vendor to perform advanced leak detection emission surveys beginning in calendar year 2025. On January 17, 2025, an unofficial version of the LDAR Final Rule was posted on the Pipeline Hazardous Materials Administration website. However, due to the change in Administration on January 20, 2025, this rule was not published in the Federal Register and is currently under review per the new Administration's discretion.

Second, the Company undertook an extensive evaluation and planning process in preparation of implementing an advanced leak detection system in compliance with the rule, whose publication to the Federal Register was anticipated by January 2025, with an effective date of three years after publication, or 2028. In 2024, the Company initiated a Request for Proposals (RFP) to consider deploying advanced leak detection for a portion of its service area for emission quantification surveys only, since the final rule requirements were not yet known. In addition, due to the capital cost of purchasing the equipment that was gleaned in the proposal process, the Company elected to pursue advanced leak detection as a service-based model, which yielded more favorable pricing and flexibility for the Company during its initial rollout of advanced leak detection for emission surveys only. The Company anticipated a three-year ramp-up period for implementation of ALD equipment, beginning in 2025 and concluding in 2028, at which time the Company had planned to use ALD equipment for leak compliance surveys in accordance with preliminary drafts of the rule. The three-year ramp-up period would allow the Company time to make adjustments to operations, budgeting, and data ingestion and storage in a cost-effective manner prior to full implementation. In early 2025, after executing an agreement with a third-party vendor selected through the RFP process, the Company initiated its first series of emissions surveys beginning April 1, 2025, in the Missouri West service area. Subsequent emission quantification surveys in the Missouri East service area will be initiated in late May or early June 2025.

Signed by: David Yonce

DR 1203
Please provide the Company's current cost estimates (both O&M and capital) for the compliance with the anticipated LDAR rule, including all supporting calculations and assumptions.

Response:
Please see the Confidential information from the 2024-09-06 EC - Advanced Leak Detection Program presentation provided in response to Data Request 1200.

Signed by: David Yonce

DR 1204
Please provide all documents or workpapers used to develop the cost estimates referenced in Mr. Yonce's direct testimony.

Response:
Mr. Yonce did not provide an actual cost estimate in his direct testimony. He stated the actual cost estimate will be dependent on the final rule, once it becomes effective. However, please see the Confidential information from the 2024-09-06 EC - Advanced Leak Detection Program presentation provided in response to Data Request 1200 for cost estimate information.

Signed by: David Yonce

DR 1205
Please provide an explanation for why the Company is unable to firm up its cost estimate, and provide a timeline for when it expects more accurate figures to be available.

Response:
Given the current regulatory environment for new regulations on a national level the Company is not able to finalize overall cost estimates for implementation of the rule.

Signed by: David Yonce

DR 1206
Please identify and describe any cost-benefit analysis the Company has conducted regarding the implementation of the advance leak detection systems.

Response:
The implementation of the advanced leak detection system is in response to pending federal requirements. The Company has not developed a formal cost-benefit analysis for the advanced leak detection system. The Company is currently conducting a three-year program of emission quantification surveys with a third-party vendor to determine appropriate parameters to better define costs and benefits for using advanced leak detection for compliance leak surveys in the future.

Signed by: David Yonce

DR 1207
Please provide the name(s) of the third-party vendor(s) engaged to conduct leak detection surveys, and copies of any executed contracts or scopes of work.

Response:
The Company has contracted with ABB, Inc.in a three-year agreement to perform emission quantification surveys using its advanced leak detection technology. ABB will use its mobile advanced leak detection technology to determine possible indications of leaks, investigate their findings and grade any leaks found using the Company's leak grading criteria.

Please see the attached CONFIDENTIAL attachments. This is confidential under 20 CSR 4240-2.135(2)(A)6.

Signed by: David Yonce

DR 1208
Please provide the Company's current leak survey schedule and explain how the Company expects to the schedule to change under the anticipated rule.

Response:
The Company currently conducts leak surveys for all mains and services every three years, in compliance with the Missouri Commission Rule requirements. The original LDAR rule proposed a similar frequency for leak surveys, and the latest unofficial version contains some provisions for conducting non-leak prone pipe surveys every five years.

Signed by: David Yonce

DR 1209
Please provide an estimate for the expected increase in the number of leaks detected as a result of the LDAR rule.

Response:
Due to the uncertainty of the final rule requirements at this time, it is difficult to estimate the expected increase in the number of leaks detected as result of the LDAR rule. The Company expects to gain additional insight in its implementation of the three-year emission quantification surveys currently in progress. Some operators have indicated they have seen an increase from two to 10 times the number of leaks detected using advanced leak detection, with mostly low impact, above ground system leaks being found. The leak rate is dependent on the detection parameters set on the equipment, which can vary in an emission only survey versus a compliance leak survey. Execution and data analysis from the Company's three-year program will allow us to be more informed and prepared to analyze the impact for future compliance leak surveys using advanced leak detection.

Signed by: David Yonce

DR 1210
Please provide historical averages for the number of leaks detected by the Company.

Response:
Please see Confidential Attachment 1210.pdf file. This is confidential under 20 CSR 4240-2.135(2)(A)5.

Signed by: David Yonce

DR 1211
How does the increase in number of leaks detected due to the LDAR rule compare to the historical averages?

Response:
The Company does not yet have quantifiable data to compare to historical averages. Based on informal feedback received from advanced leak detection technology companies and natural gas operators who have implemented some form of advanced leak detection, the Company expects an initial increase in the number of leaks detected that should lower over time as the program reduces the number of high emission leaks by proactive surveys and repairs.

Signed by: David Yonce

DR 1212
Please provide the Company's current leak grading criteria and repair timelines.
a. Please provide an explanation on how the grading criteria and repair timelines are expected to change under the LDAR rule.

Response:
The current MO Commission Rules outline four classes (1-4) of natural gas leak grades. 49 CFR Part 192 does not presently contain prescriptive definitions. Please see the attached file for a comparison of current leak grades and the initial grades proposed in the LDAR NRPM.

Signed by: David Yonce

DR 1213
Please provide the number of leaks detected, repaired, and rechecked over the past five years, broken down by year, grade, and repair timeline.

Response:
Please see Confidential Attachment 1213.pdf. This is confidential under 20 CSR 4240-2.135(2)(A)5.

Signed by: David Yonce

DR 1214
Please provide a breakdown of all costs (O&M and capital) the Company proposes to track under the requested deferral mechanism (tracker), by year and FERC account.

Response:
The Company proposes to track the following O&M costs related to the tracker deferral mechanism:

- ABB's costs to perform emission quantification surveys, investigate indications and grade any leaks found
- Allocate portion of personnel costs associated with the positions of Manager – Advanced Leak Detection Program and Analyst – Advanced Leak Detection

The following accounts will be used to capture ABB's costs:

CO_120 - Spire Missouri East	AC_874000 - Mains Expenses
CO_130 - Spire Missouri West	AC_874000 - Mains Expenses

Signed by: David Yonce

DR 1215

Please state whether the Company is proposing to recover costs incurred prior to the final LDAR rule's effective date, and if so, please provide regulatory justification and any legal justification.

Response:

The Company is proposing to recover certain costs incurred prior to the final LDAR rule's effective date. In particular, the company will seek to recover costs associated with its advanced leak detection program going forward. The PIPES Act of 2020, Section 113 outlined requirements for the Secretary of Transportation to promulgate a regulation that included provisions for leak detection and repair programs and advanced leak detection technologies and practices. The subsequent LDAR rule was PHMSA's response to that mandate. Many natural gas operators have already initiated an advanced leak detection program for their compliance leak surveys. The Company is taking a measured approach to implementing the technology on a limited basis in anticipation of an eventual final LDAR rule based on the Congressional mandate.

Signed by: David Yonce