

**Spire Missouri
GR-2021-0108**

Response to Office of Public Counsel Data Request 8521

Is Spire requesting the Commission reduce the average service life of diaphragm meters to ten years to coincide with the mandated replacements it claims this rule requires? If not please provide a detailed explanation as to why.

DR Requested by John Robinett (john.robinett@opc.mo.gov).

Response:

There is nothing in Spire's testimony that has suggested the service life is 10 years. The meter sampling program variance begins at 10 years and meters of various vintages from 10 years to approximately 35 years are removed, tested, and condemned each year to meet this rule. Spire found in the 2018 sample year that the average age of a removed diaphragm meter was 18.8 years in Missouri East and 22.1 years in Missouri West. Spire has further provided evidence that it does not make sense to refurbish diaphragm meters and return them to service in most cases.

Signed by: James Rieske