

**STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION**

In the Matter of Establishment of a )  
Working Case for the Development of Best ) **File No. OW-2025-0314**  
Practices for Wildfire Mitigation in Missouri )

**SPIRE MISSOURI INC.'S RESPONSES TO  
ATTACHMENT B "QUESTIONS FOR GAS CORPORATIONS"  
OF THE ORDER OPENING THIS CASE**

COMES NOW Spire Missouri Inc., (hereinafter the "Company") and in response to the order of the Public Service Commission (hereinafter "Commission"), provides the following responses to Attachment B of the Commission's Order Opening a Working Case to Assist in the Development of Best Practices for Utility Wildfire Mitigation in Missouri and Assessment of Risk. For the Commission's convenience, the Company has set forth each question prior to its response:

**A. General**

1. Please explain how the threat of wildfires is addressed in Emergency Plans (see 20 CSR 4240-40.030(12)(J) for emergency plan requirements). Does your Emergency Plan include wildfire-specific triggers, response timelines, or communications protocols? If so, please describe.

**COMPANY RESPONSE:** Spire Missouri Inc.'s ("Company") Emergency Plan SOP references our Crisis Management Plan (CIMP) regarding natural disasters associated with 20 CSR 4240-40.030(12)(J). While wildfires are not specifically addressed, the Company would follow this procedure in the event of a wildfire.

2. Have you met with local emergency responders (e.g. fire, police) to discuss coordinated responses to wildfires (see 20 CSR 4240-40.030(12)(J)1.B.)? If "yes", please describe the outcome of these meetings.

**COMPANY RESPONSE:** The Company meets with emergency responders on general protocols.

3. Have you provided any information or instructions to your customers regarding actions that should be taken with respect to natural gas service in the event of wildfire evacuations (e.g. closing valve at service riser)? If “yes”, please explain what actions you have recommended, and also please explain how this information is disseminated (e.g., door tags, emergency preparedness mailers, website alerts)?

**COMPANY RESPONSE:** No, wildfire specific evacuation information has not been provided to customers. The Company does not recommend that customers, who lack appropriate training, operate valves on our facilities.

4. Have you evaluated the temperature ratings of your above ground natural gas or renewable natural gas assets (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the following:

a.) Ability of above ground pressure reduction equipment (e.g. regulator stations and farm taps) to control downstream pressure if involved in a fire? If “yes”, please describe the outcome of that evaluation.

**COMPANY RESPONSE:** The Company has not evaluated the temperature rating on above ground natural gas or renewable natural gas assets to control downstream pressure if involved in a fire.

b.) Ability of service regulators to control downstream pressure if involved in a fire? If “yes”, please describe the outcome of that evaluation.

**COMPANY RESPONSE:** The Company has not evaluated the ability of service regulators to control downstream pressure if involved in a fire.

c.) Potential disruptions in SCADA (supervisory control and data acquisition) communications between monitored and controlled physical assets and control room.

**COMPANY RESPONSE:** The Company has not evaluated the temperature rating on SCADA equipment deployed to our above-grade facilities.

5. Have you evaluated the temperature ratings and burial depths of your plastic piping systems with respect to the potential for heat damage if ground surface above is involved in a wildfire? If “yes”, please describe the outcome of that evaluation.

**COMPANY RESPONSE:** With the variability of potential wildfire and pipe depth conditions, the Company has not made temperature-specific evaluations. However, our integrity program assesses natural force threats to our pipeline system and evaluates the overall risk and potential mitigation activities.

6. Have you evaluated the temperature ratings of your natural gas or renewable natural gas assets in vaults (including internal components such as O-rings and other seals, diaphragms, insulators) with respect to the ability of pressure reduction equipment to control downstream pressure in the event of a wildfire at ground surface? If “yes”, please describe the outcome of that evaluation.

**COMPANY RESPONSE:** The Company has not evaluated the temperature ratings of natural gas or renewable natural gas assets in vaults in the event of a wildfire at ground surface.

7. Do you partner with fire departments or other agencies to communicate and respond to fires and wildfires? If yes, please explain.

**COMPANY RESPONSE:** The Company regularly coordinates with fire departments and other agencies in the event of fires. The Company provides general training in responding to emergencies, which includes establishing communications.

8. Do you have insurance coverage for wildfire damage? If “yes”, does your insurance coverage require you to have a wildfire mitigation plan or make any special preparations regarding wildfires? If not currently insured against wildfire risk, please explain why and whether coverage has been denied or deemed unavailable or uneconomical.

**COMPANY RESPONSE:** Yes. The Company has an “all risk” policy for Property Insurance that has no exclusions for wildfire, as well as Excess Liability Insurance that covers wildfire. The Company’s underwriters see gas utilities as a lower risk, so it has not been asked to provide any mitigation plans or preparations.

## **B. Natural Gas and Renewable Natural Gas Distribution Systems**

1. Does your current Distribution Integrity Management Plan (DIMP) address the threat of wildfires? Please explain.

**COMPANY RESPONSE:** Wildfires would be included in the risk model as part of the threat category of “Natural Force.”

## **C. Natural Gas and Renewable Natural Gas Transmission Systems**

1. How is the threat of wildfires addressed in your transmission integrity management program?

**COMPANY RESPONSE:** Wildfires would be included in the risk model as part of the threat “Weather-Related and Outside Force.”

#### **D. Infrastructure Resilience & Risk Assessment**

1. What steps have you taken to assess wildfire risks near pipelines and critical infrastructure?

**COMPANY RESPONSE:** The Company has reviewed the Federal Emergency Management Agency's (FEMA) National Risk Index for Wildfire Risk and determined that all its transmission pipelines are in Very Low or Relatively Low Risk Counties.

2. How do you protect gas transmission and distribution systems from wildfire damage?

**COMPANY RESPONSE:** The Company's rights-of-way for gas pipelines are routinely cleared of vegetation to facilitate patrols and surveys as well as reduce the risk of weather-related threats.

3. Are there plans to upgrade or harden gas infrastructure in wildfire-prone areas?

**COMPANY RESPONSE:** According to FEMA, the Company does not operate in wildfire-prone areas.

4. Have you identified high-risk zones where wildfire-related damage to gas pipelines is most likely?

**COMPANY RESPONSE:** According to FEMA, there are no high-risk zones of wildfire-related damage in the Company's service territory.

#### **E. Emergency Response & Safety Protocols**

1. What protocols are in place for shutting down gas service in areas threatened by wildfires?

**COMPANY RESPONSE:** Protocols within the Emergency Plan for natural disasters include: locate valving to isolate the system affected, make an effort to shut off each meter in areas where danger is imminent, define area of concerns at peak disaster conditions, establish a command post (if applicable the post should be established jointly with other utilities and local law enforcement personnel), and assign Company personnel to areas of responsibility.

2. Do your emergency procedures address isolating gas to specific locations by use of below-ground inlet valves at district regulator stations? If "no", please explain what alternative measures you could use to isolate the flow of gas to specific locations during a wildfire event.

**COMPANY RESPONSE:** Yes.

3. How do you coordinate emergency response efforts with fire departments and local agencies?

**COMPANY RESPONSE:** For most emergencies related to our natural gas distribution system, local operations personnel coordinate with fire and law enforcement to ensure safety at the location of incidents involving gas outages. For escalated responses that involve incidents such as natural disaster response, Spire will also assign more senior personnel and/or physical security as liaisons with local incident response command to ensure area-wide coordination.

4. Have you coordinated with emergency management to ensure that critical infrastructure is continuously supplied in the case of damage to gas supply infrastructure or the need for shutoff?

**COMPANY RESPONSE:** The Company regularly coordinates with local emergency management agencies in the event of natural gas outages and/or damage to natural gas infrastructure. The Company's foremost objective in the event of an incident is to safely maintain or restore natural gas service to its customers as soon as possible. Personnel involved in the coordination vary depending on the scale and severity of the incident, as described in 3. above.

5. How quickly can you restore gas service after wildfire-related disruptions?

**COMPANY RESPONSE:** Without knowing the magnitude of the wildfire-related disruption, the Company is unable to answer this hypothetical question.

6. What measures are taken to prevent underground pipelines from being compromised by extreme heat?

**COMPANY RESPONSE:** The Company's standards define the appropriate depth for pipe installation and does not have pipe in high-risk areas for wildfires. The integrity program assesses potential mitigative actions for pipe threats based on overall risk if necessary.

#### **F. Pipeline Integrity & Post-Wildfire Damage Assessments**

1. What inspections are conducted to ensure gas pipeline integrity after a wildfire?

**COMPANY RESPONSE:** Wildfires are not currently addressed. However, if a wildfire occurred, the Company would follow similar procedures as defined by our Emergency Response to Flooding as defined in the Company's Emergency Plan SOP.

2. How do you monitor and prevent leaks or explosions caused by wildfire-damaged infrastructure?

**COMPANY RESPONSE:** The Company has not experienced leaks or explosions caused by wildfire-damaged infrastructure. However, in situations where stopping the flow of natural gas will take a prolonged period of time, or where the migration of natural gas cannot be mitigated, the Company would consider requesting the Fire Department contact the appropriate utilities to order all electric and telephone services within the affected area be shut off, in order to eliminate them as possible sources within the affected area. Additionally, all Company employees whose job duties include responding to emergencies have a laminated card containing a checklist of key actions items to be taken or considered both when arriving at the scene of a gas leak and when gas readings are found inside a structure at or in excess of 20% LEL (1% gas/air).

3. Are there contingency plans for replacing pipelines in fire-damaged areas?

**COMPANY RESPONSE:** The Company would follow its Spire 170 SOP series for repairs. The Company, through the following departments: Pipeline and System Integrity, System Planning, and Construction Engineering, would create a replacement plan.

#### **G. Customer Communication & Public Safety**

1. How do you notify customers of wildfire-related service disruptions or potential safety hazards?

**COMPANY RESPONSE:** The Company has never been in this situation, but it has normal safety messages that would cover wildfire-related service disruptions or potential hazards.

2. What public education efforts are in place to inform customers about wildfire-related gas safety measures?

**COMPANY RESPONSE:** The Company has general gas safety public education efforts.

3. Are customers provided with clear guidance on when and how to shut off their gas supply during a wildfire?

**COMPANY RESPONSE:** No, for safety reasons, the Company does not encourage its customers to shut off their gas supply during any emergency situation.

4. Are emergency contact procedures clearly communicated to residents in wildfire-prone regions?

**COMPANY RESPONSE:** The Company communicates regarding emergencies, which would include wildfires.

5. Do you have a policy with regards to medically vulnerable or critical infrastructure customers and are they prioritized for communication or assistance?

**COMPANY RESPONSE:** The Company has work practices in place regarding medically vulnerable and critical infrastructure which are prioritized for communication and assistance.

6. Do you provide specific guidance to businesses and industrial users on wildfire-related gas safety? Please share specifics.

**COMPANY RESPONSE:** The Company has general gas safety guidance that it provides to both business and industrial users that would include, but is not specific to, wildfires.

#### **H. Mutual Aid Agreements & Industry Cooperation**

1. Do you participate in mutual aid agreements with other gas providers for emergency response? Please provide a copy of a current agreement.

**COMPANY RESPONSE:** Yes, please see the attached American Gas Association Mutual Assistance Agreement effective September 10, 2020. It is currently in the process of being revised, but this is the most recent version and is currently in effect. This document is confidential under 20 CSR 4240-2.135(2)(A)6 and 7.

2. How do you coordinate with electric utilities to prevent infrastructure conflicts during wildfire mitigation efforts?

**COMPANY RESPONSE:** The Company utilizes its Emergency Plan to coordinate with all local utilities. Per the Emergency Plan, the Company would consider requesting the Fire Department contact the appropriate utilities to order that all electric and telephone services within the affected area be shut off, in order to eliminate them as possible sources within the affected area.

3. Are there standardized protocols for sharing wildfire risk data with other utilities and emergency responders?

**COMPANY RESPONSE:** No, the Company does not operate in areas prone to wildfires.

WHEREFORE, Spire Missouri appreciates the opportunity to participate in this docket and respectfully requests that the Commission accept this response.

Respectfully submitted,

/s/ Sreenivasa Rao Dandamudi

Sreenivasa Rao Dandamudi, MoBar #50734  
Director, Associate General Counsel – Regulatory  
Spire Missouri Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
314-342-0702 (Office)  
sreenu.dandamudi@spireenergy.com

J. Antonio Arias, MoBar #74475  
Director, Associate General Counsel – Regulatory  
Spire Missouri Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
314-342-0655 (Office)  
antonio.arias@spireenergy.com

**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent either by mail or electronic mail to all parties of record on this 30<sup>th</sup> day of June, 2025.

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/s/ Sreenivasa Rao Dandamudi  
Sreenivasa Rao Dandamudi