

**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	)	<b><u>File No. GS-2025-0295</u></b>
Kansas City, Missouri	)	

**STAFF’S MOTION TO REQUEST EXTENSION**

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

1. On April 23, 2025, Staff, by and through counsel, and for its Motion to Establish a Case, stated that pursuant to Section 386.020 of the Revised Statutes of Missouri (“RSMo”), the Commission has jurisdiction over Spire Missouri, Inc. d/b/a Spire (Spire). Staff stated that on Tuesday, April 22, 2025, a reportable gas incident occurred in the 9500 block of Grandview Road in Kansas City, Missouri, an area serviced by Spire, when 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 a flash fire injured an employee.

2. On April 28, 2025, the Commission opened Case No. GS-2025-0295 to receive an incident report from Staff about the natural gas incident that occurred on April 22, 2025, at the 9500 block of Grandview Road in Kansas City, Missouri located in Grandview, Missouri. The Commission ordered that Staff shall file its final incident report no later than September 30, 2025.

3. Since the opening of this Case, Staff have conducted in-person interviews with employees of Spire and the third-party excavator who were on site during the incident and events leading up to the incident, and have conducted written discovery through

data requests. It is Staff's understanding that to date, Spire has not completed its investigation of its failure investigation for this incident as required by 20 CSR 4240-40.030(12)(L), or a root cause analysis as required by Paragraph 17 of the Stipulation and Agreement approved by the Commission in Case No. GC-2022-0087.

4. Staff anticipates that following receipt and review of Spire's investigation of failure and root cause analysis, Staff may need to request additional clarification. Assuming that Spire's failure investigation and root cause analysis are completed by the end of October, Staff anticipates that it will require an additional three months to review Spire's deliverables, conduct follow-up discovery, if needed, and to draft and finalize its report.

**WHEREFORE**, for the above-stated reasons, Staff respectfully requests the Commission order Staff to file a report regarding its investigation, or a report on the status of Staff's investigation, no later than January 30, 2026, and to grant such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

**/s/ J. Scott Stacey**

J. Scott Stacey  
Deputy Counsel  
Missouri Bar No. 59027  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
573-522-6279  
573-751-9285 (Fax)  
[scott.stacey@psc.mo.gov](mailto:scott.stacey@psc.mo.gov)

**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 26<sup>th</sup> day of September, 2025.

**/s/ J. Scott Stacey**