

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of)	
Spire Missouri Inc. to Extend Existing)	Case No. GE-2026-_____
Waiver Related to Large Commercial and)	
Industrial Customer Yard Lines)	

**APPLICATION OF SPIRE MISSOURI INC.
TO EXTEND EXISTING WAIVER
RELATED TO LARGE COMMERCIAL AND
INDUSTRIAL CUSTOMER YARD LINES**

COMES NOW Spire Missouri Inc., (“Spire Missouri” or “Company”), pursuant to 20 CSR 4240-2.060 and 2.080 of the Rules of Practice and Procedure of the Missouri Public Service Commission (“Commission”), and requests an extension of its existing waiver for replacing unprotected steel yard lines for large commercial and industrial customers, and requests a waiver from the notice provisions of 20 CSR 4240-4.017(1), respectfully stating the following:

BACKGROUND

1. Spire Missouri and its predecessors, Laclede Gas Company and Missouri Gas Energy, have been replacing unprotected steel service and yard lines since the early 1990’s pursuant to 20 CSR 4240-40.030(15)(C), which required gas utilities to replace and, where applicable under 20 CSR 4240-40.030(8)(B)1, to assume ownership of such lines when used to serve residential and small commercial customers. Gas utilities are permitted under 20 CSR 4240-40.030(8)(B)2 to allow larger commercial and industrial customers to install, replace, own and maintain yard lines provided that the new yard line is cathodically protected, coated steel or polyethylene pipe and that the operator’s installation standards are met. Gas utilities are also required to monitor for safety purposes those yard lines owned by larger commercial and industrial customers by performing leakage surveys.

2. Spire and its predecessors have been granted a number of waivers to extend out the deadline to replace all unprotected steel yard lines across its service territory. In Case No. GE-2020-0294, Spire requested a waiver from 20 CSR 4240-40.030(15)(C) and Commission orders in Case Nos. GO-99-155 and GO-2002-50 to address the remaining large commercial and industrial customer unprotected steel yard lines by December 31, 2025.¹

3. On July 15, 2020, the Commission issued its Order in Case No. GE-2020-0294, effective August 14, 2020, granting the Company's application for waiver, and allowing for the Company to replace unprotected steel yard lines for large commercial and industrial customers by December 31, 2025, subject to certain conditions as recommended by Staff of the Missouri Public Service Commission ("Staff").

APPLICATION

4. Spire Missouri is a public utility and gas corporation incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri 63101. A Certificate of Good Standing evidencing Spire's standing to do business in Missouri has been filed in Case No. GF-2025-0053 and is incorporated herein by this reference. The information in such Certificate is current and correct.

5. Spire Missouri is engaged in the business of distributing and transporting natural gas to customers in Missouri as a gas corporation subject to the jurisdiction of the Commission. Spire serves customers in the City of St. Louis and the counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, St. Genevieve, St. Francois, Madison, Butler, Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Cooper, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Newton,

¹ Prior to this, the Commission granted similar waivers to Spire's predecessors in Case Nos. GO-99-155 and GO-2002-50.

Pettis, Platte, Ray, Saline, Stone, and Vernon.

6. Communications in regard to this Application should be addressed to:

Robert Gardner
Director, Pipeline Safety Compliance
Spire Missouri Inc.
605 Richard Arrington, Jr. Blvd N
Birmingham, AL 35203
(205) 365-7846
bob.gardner@spireenergy.com

7. Other than cases that have been docketed at the Commission, Spire Missouri has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates.

8. Spire Missouri is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

9. Attached to this application is the Affidavit of Bob Gardner, stating that the information included in this Application is true and correct to the best of his knowledge.

REQUEST TO EXTEND EXISTING WAIVER

10. Under the waiver and program approved in GE-2020-0294, Spire has completed the replacements of unprotected steel yard lines for large commercial and industrial customers, with the exception of yard lines owned by **[REDACTED]** (the “Customer”). The Company has been advised by the Customer that the replacement will not be completed by the end of 2025. Therefore, Spire Missouri requests that the Commission extend the previous waiver granted in GE-2020-0294, which expires on December 31, 2025, until December 31, 2026. However, the Company will make every effort to complete this work by July 31, 2026.

11. Spire Missouri has already performed its work necessary for the new customer yard lines to connect to Spire’s distribution system. The Customer and its contractor, **[REDACTED]** must now complete the above ground portion of the work that runs through their regulators to the

Company's meters.

12. The Customer and its contractor have assured Spire that the replacement will be complete by July 31, 2026.

13. Based on current estimates, the Company believes that any required work to achieve these replacements can be done for approximately **[REDACTED]**. The Company will seek to recover replacement costs through the normal rate case process, and the prudence and allocation of these costs will be subject to the review of Staff and intervenors.

14. The extension of this waiver will not compromise gas safety. While Spire Missouri currently does not own the yard line, it has undertaken, pursuant to the Commission's safety rules, the duty to leak survey such lines so that leaks can be repaired or facilities replaced where they might pose a risk to public safety. To help ensure that such risks are eliminated, the Company also has the right under its tariffs to discontinue natural gas service if the customer continues to operate such facilities in what the Company believes is an unsafe manner.

15. To further facilitate the successful completion of such work, the Company agrees to continue to implement the following conditions from the previous Order in Case No. GE-2020-0294:

- (a) Spire Missouri shall conduct additional public awareness efforts to notify customers when replacement of yard lines will be delayed in accordance with this waiver;
- (b) Spire Missouri shall conduct weekly odorant intensity tests, in accordance with test requirements in 20 CSR 4240-40.030(12)(P)6, in areas where replacement of unprotected steel yard lines will be delayed in accordance with this waiver; and
- (c) Spire Missouri shall conduct quarterly leak surveys of the unprotected steel yard line until it is replaced in accordance with this waiver.

16. Staff has been advised of this filing and is not opposed to this request.

REQUEST FOR WAIVER FROM 60-DAY NOTICE RULE

17. Commission Rule 20 CSR 4240-4.017(1) provides, in part, as follows:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

18. Commission Rule 20 CSR 4240-4.017(1)(D) permits a party to request a waiver of the above cited rule for good cause. The rule provision specifically provides that good cause may be established by submitting a verified declaration that the filing party has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. The Company interprets this to mean that good cause is established if the filing party has had no communication with a member of the office of the Commission outside of pleadings or other public communications. Subject to that understanding, the Company has included in the Affidavit of Bob Gardner, attached to this application, a declaration that neither the Company nor any person or entity acting on behalf of the Company, has had a communication with a member of the office of the Commission in the last 150 days regarding any substantive issues that are likely to arise in the case. For that reason, the Company requests that the Commission grant a waiver of the 60-day notice requirement for Spire Missouri's application.

WHEREFORE, Spire Missouri Inc. respectfully requests that the Commission approve the Company's application and grant an extension of the existing waiver until December 31, 2026, to complete the replacement of the remaining industrial customer yard line, approve the requested waiver of the 20 CSR 4240-4.017(1), and order any other relief that is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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

ATTORNEY FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Application has been sent by electronic mail to Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 30th day of September, 2025.

/s/ Julie Johnson

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AFFIDAVIT

STATE OF ALABAMA)
) SS.
COUNTY OF JEFFERSON)

Robert Gardner, being of lawful age, being first duly sworn, deposes and states:

1. My name is Robert Gardner. I am Director, Pipeline Safety Compliance for Spire Missouri Inc. My business address is 605 Richard Arrington, Jr. Blvd N, Birmingham, Alabama 35203.

2. I hereby swear or affirm, and declare, that the statements contained herein and in the Application of Spire Missouri Inc. Concerning Large Industrial Yard Line are true and correct to the best of my knowledge and belief.

3. I also hereby declare that, other than pleadings or other public communications, Spire Missouri Inc. has had no communication with the office of the Commission, within the prior one hundred and fifty (150) days, regarding any substantive issue likely to be in the above referenced case.



Robert Gardner

Subscribed and sworn to before me this 29 day of September 2025.



Notary Public

