

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

In the Matter of the Application of Spire)
Missouri, Inc. d/b/a Spire to Extend Existing) **File No. GE-2026-0087**
Waiver Related to Large Commercial and)
Industrial Customer Yard Lines)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Recommendation* states as follows:

1. On September 30, 2025, Spire Missouri Inc. d/b/a Spire (“Spire”) filed an application requesting an extension to its existing waiver for replacing unprotected steel yard lines owned by large commercial and industrial customers,¹ along with a requested waiver of the 60-day notice requirement of Commission Rule 20 CSR 4240-4.017 (the “Application”).

2. Also on September 30, 2025, the Commission issued an order establishing October 31, 2025, as the date by which application for intervention must be filed, and directing Staff to file a recommendation regarding the Application no later than November 14, 2025. No applications to intervene were filed on or by October 31, 2025.

3. As discussed in more detail in the attached Staff Memorandum, attached as Confidential Appendix A and incorporated herein, Staff reviewed Spire’s application, applicable Commission rules and prior orders.

¹ As stated in Spire’s Application at Paragraph 10, “Under the waiver and program approved in GE-2020-0294, Spire has completed replacement of unprotected steel yard lines for large commercial and industrial customers, with the exception of yard lines owned by” one customer.

4. Commission Rule 20 CSR 4240-40.030(18) allows the Commission to waive, in whole or in part, compliance with any of the requirements contained in Commission Rule 20 CSR 4240-40.030 upon a showing that gas safety is not compromised. Additionally, 20 CSR 4240-2.205 allows the Commission to grant a variance from, or waive, any rule promulgated by the Commission upon a finding of good cause.

5. Staff recommends that the Commission approve Spire's request to extend the waiver granted in Case No. GE-2020-0294 (Spire East and Spire West)² for the one remaining yard line located in the Spire West operating area to December 31, 2026.

6. Staff further recommends that this waiver be approved with conditions. The conditions listed in the Staff Memorandum include all the conditions necessary to ensure gas safety is not compromised by approval of this request. This waiver should be conditioned or limited as follows:

- a) The effective date of this waiver will end December 31, 2026.
- b) The waiver granting an extension until December 31, 2026, is only applicable to the replacement of the one remaining unprotected steel yard line identified in Spire's Application.
- c) Spire shall conduct additional public awareness to the customer where replacement of the industrial yard line will be delayed in accordance with this waiver.
- d) Spire shall continue conducting weekly odorant intensity tests in accordance with test requirements in 20 CSR 4240-40.030(12)(P)6. in the area where replacement of the remaining industrial yard line will be delayed in accordance with this waiver.
- e) Spire shall continue conducting quarterly leak surveys of the remaining industrial steel yard line until it is replaced in accordance with this waiver.

² As stated in Spire's Application at Paragraph 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')."

- f) If the yard line is replaced on or before July 31, 2026, Spire shall file a status report in this case within 30 days of completion of the yard line replacement that provides the date that replacement was completed.
- g) If the yard line is not replaced by July 31, 2026, Spire shall file a status report in this case by August 14, 2026, describing its progress towards completion, actions remaining, and plan to complete by December 31, 2026.

7. Spire's Application contained a request that the Commission waive the 60-day filing notice required by 20 CSR 4240-4.017(1). Spire's Application provided a verified declaration that it had not communicated with the Commission within the prior 150 days regarding any substantive issues likely to be in this case, and therefore, Staff agrees good cause exists, pursuant to 20 CSR 4240-4.017(1)(D) to waive the 60-day notice requirement.

WHEREFORE, as set forth in Staff's Memorandum, Staff recommends the Commission issue an order approving Spire waiver request(s), and grant such other and further relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Alexandra Klaus

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties and/or counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 13th day of November, 2025.

/s/ Alexandra Klaus