

**MEMORANDUM**

TO: Missouri Public Service Commission Official Case File,  
File No. GE-2026-0087, Spire Missouri Inc.

FROM: John D. Kottwitz, Associate Engineer, Safety Engineering Department  
Zachary Millsap, Assistant Engineer, Safety Engineering Department

/s/ Kathleen A. McNelis, PE / 11/13/2025  
Safety Engineering Department/ Date

SUBJECT: Staff Recommendation Regarding Request by Spire Missouri Inc. to Extend  
Existing Waiver Related to Large Commercial and Industrial Customer Yard Lines

DATE: November 13, 2025

**Executive Summary**

Spire Missouri Inc. (Spire) filed on September 30, 2025, its *Application of Spire Missouri Inc. to Extend Existing Waiver Related to Large Commercial and Industrial Yard Lines* (“Application”), stating that Spire has completed the replacements of the unprotected steel yard lines<sup>1</sup> except for one remaining yard line owned by \*\* [REDACTED] \*\*. \*\*2

In this Application, Spire is requesting approval from the Missouri Public Service Commission (Commission) to extend the December 31, 2025, deadline to replace remaining yard lines that was granted by the Commission in Case No. GE-2020-0294 until December 31, 2026, to complete the replacement of the one remaining industrial yard line. Spire additionally stated that it will make every effort to complete replacement of this remaining yard line by July 31, 2026.<sup>3</sup>

On September 30, 2025, the Commission ordered its Staff to file either a recommendation regarding Spire’s Application, or a status report advising when it expects to file a recommendation. As further discussed in Sections 2 through 4 of this Memorandum, the Commission’s Safety Engineering Department Staff (Staff) have reviewed the Application, applicable Commission

---

<sup>1</sup> In Case No. GE-2020-0294, the Commission granted Spire’s request for an extension of time through December 31, 2025, to complete replacement of certain large commercial and industrial customer-owned unprotected steel yard lines. Additional background regarding the yard line replacement program is provided in Section 1 of this Memorandum.

<sup>2</sup> Paragraph 10 of Application.

<sup>3</sup> Paragraph 10 of Application.

rules, and past Commission orders as a basis for making its recommendation in this case. Staff recommends that the Commission extend the waiver granted to Spire in Case No. GE-2020-0294 for the one remaining industrial yard line identified in Spire's Application through December 31, 2026, subject to the following conditions:

- a) The effective date of this waiver will end December 31, 2026.
- b) This waiver is only applicable to the one remaining yard line identified in Spire's Application.
- c) Spire shall conduct additional public awareness to the customer where replacement of the remaining 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.
- 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.

Staff notes that while Spire provided cost information in Paragraph 13 of its application, Staff is not making recommendations regarding the financial aspects of the yard line replacement at this time, as Spire states this will be addressed through the normal rate case process.

## **1 Background Information**

Spire Missouri East, formerly Laclede Gas Company (Laclede), and Spire Missouri West, formerly Missouri Gas Energy (MGE), have been replacing unprotected steel service lines and yard lines pursuant to replacement programs established in 1990 to comply with 20 CSR 4240-40.030(15)(C)3., and subsequent Commission Orders granting additional time to complete the

replacement programs.<sup>4</sup> Most recently prior to the current Application, the Commission granted Spire a waiver on July 15, 2020, in Case No. GE-2020-0294 extending the completion deadline for replacement of certain yard lines owned by large commercial or industrial customers through December 31, 2025.

On September 30, 2025, Spire filed the current Application, requesting 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 one remaining industrial customer yard line that is in the Spire Missouri West territory.

The Application includes a statement that Spire agrees to continue 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.

## **2 Applicable Commission Rules**

### **2.1 Waivers of Compliance**

20 CSR 4240-40.030(18) states that upon written request to the Secretary of the Commission, the Commission, by authority order and under such terms and conditions as the Commission deems appropriate, may waive in whole or part compliance with any of the requirements contained in this rule.<sup>5</sup> Waivers will be granted only on a showing that gas safety is not compromised. If the waiver request would waive compliance with a federal requirement in

---

<sup>4</sup> Section 3 of this Memorandum provides additional information regarding applicable Commission rules and orders.

<sup>5</sup> Rule in this context refers to 20 CSR 4240-40.030.

49 CFR part 192, additional actions shall be taken in accordance with 49 USC 60118 except when the provisions of subsection (17)(G)<sup>6</sup> apply.

## 2.2 Requirements to Leak Survey and Replace Unprotected Steel Yard Lines

The requirements applicable to Spire's replacement programs for unprotected steel service line and yard lines are at 20 CSR 4240-40.030(15)(C)3., which states:

### (C) Replacement Program - Unprotected Steel Service Lines and Yard Lines.

At a minimum, each investor-owned, municipal or master meter operator shall establish instrument leak detection survey and replacement programs for unprotected operator-owned and customer-owned steel service lines and yard lines. The operator may choose from the following options,<sup>7</sup> unless otherwise ordered by the commission:

...

3. Conduct annual instrument leak detection surveys on all unprotected steel service lines and unprotected steel yard lines and implement a replacement program. The program must prioritize replacements based on the greatest potential for hazards. At a minimum, ten percent (10%) of the customer-owned unprotected steel service lines in the system as of December 15, 1989, must be replaced annually. Beginning with calendar year 1994, a minimum of five percent (5%) of the unprotected steel yard lines, and operator-owned and installed unprotected steel service lines in the system as of December 15, 1989, must be replaced annually.

---

<sup>6</sup> Subsection 20 CSR 4240-40.030(17)(G) applies to an operator's gas distribution integrity management program and defines when an operator may deviate from required periodic inspections. This subsection is not applicable to the current Application.

<sup>7</sup> Original subsection (15)(C) was effective on December 15, 1989, and required operators to notify the Commission of which replacement program option the operator had chosen by May 1, 1990 – three options were provided in paragraphs (15)(C)1., 2. and 3. The Commission notification provision was removed and the calendar year 1994 provision was added in a 1995 amendment.

### 2.3 Yard Line Definition

20 CSR 4240-40.030(1)(B)60. states that yard line means an underground fuel line<sup>8</sup> that transports gas from the service line to the customer's building. If multiple buildings are being served, building means the building nearest to the connection to the service line. For purposes of this definition, if aboveground fuel line piping at the meter location is located within five feet (5') of a building being served by that meter, it will be considered to the customer's building and no yard line exists. At meter locations where aboveground fuel line piping is located greater than five feet (5') from the building(s) being served, the underground fuel line from the meter to the entrance into the nearest building served by that meter will be considered the yard line and any other lines are not considered yard lines.

## 3 Previous Commission Cases

### 3.1 Predecessor Company Cases

KPL Gas Service, one of MGE's predecessor companies, notified the Commission in Case No. GO-91-239 that the replacement program option in paragraph (15)(C)3. was chosen for its service/yard line replacement program. The Commission granted MGE's initial request for additional time to complete replacements in Case No. GO-99-302 and approved an additional extension until June 30, 2020, in Case No. GO-2002-50.

### 3.2 Spire Cases

Spire was granted a conditional waiver in Case No. GE-2020-0373 extending the completion deadline for Spire Missouri West (formerly MGE) from June 30, 2020, to December 31, 2020. Spire was then granted a waiver in Case No. GE-2020-0294 to complete unprotected steel yard lines to certain large commercial and industrial customers by December 31, 2025, subject to conditions that required additional odorant concentration monitoring, additional leakage surveys, and provision of additional public awareness information to affected customers.

---

<sup>8</sup> "Fuel line means the customer-owned gas piping downstream from the outlet of the customer meter or operator-owned pipeline, whichever is farther downstream". See 20 CSR 4240-40.030(1)(B)21.

#### **4     Staff Analysis**

The standard for granting a waiver of Commission pipeline safety rules is in 20 CSR 4240-40.030(18) – Waivers of Compliance, which requires in part that waivers will be granted only on a showing that gas safety is not compromised. Staff has reviewed the conditions in the waiver granted by the Commission in Case No. GE-2020-0294, and believes with continued implementation of these conditions, safety will not be compromised by granting the requested time extension proposed in Spire’s Application.

A risk associated with delayed replacement of unprotected steel yard lines would be leaks or failures of those lines. This risk was also identified for the delayed replacement of unprotected steel service lines and yard lines in Case Nos. GE-2020-0373 and GE-2020-0294. Staff believes continuing implementation of the conditions required in the *PSC Order* in Case No. GE-2020-0294 will provide for enhanced detection of potential leaks or failures, and continuing to provide public awareness information to the customer regarding how to recognize gas leaks, and actions to take in the event a leak or failure is suspected.

#### **5     Staff Recommendation**

Staff recommends that the Commission approve the requested extension of the waiver from 20 CSR 4240-40.030(15)(C)3. granted in Case No. GE-2020-0294 with the following conditions and limitations:

- 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.
- 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.

**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 )

**AFFIDAVIT OF JOHN D. KOTTWITZ**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

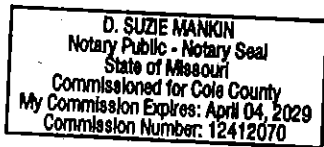
**COMES NOW JOHN D. KOTTWITZ** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

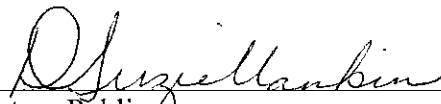
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**JOHN D. KOTTWITZ**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 10<sup>th</sup> day of November 2025.



  
\_\_\_\_\_  
Notary Public

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

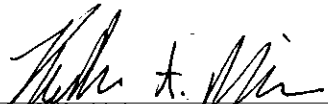
In the Matter of the Application of Spire )  
Missouri Inc. d/b/a Spire to Extend Existing ) File No. GE-2026-0087  
Waiver Related to Large Commercial and )  
Industrial Customer Yard Lines )

**AFFIDAVIT OF KATHLEEN A. McNELIS, PE**

STATE OF MISSOURI )  
 ) ) SS.  
COUNTY OF COLE )

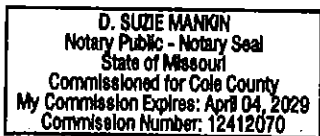
**COMES NOW KATHLEEN A. McNELIS, PE** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to her best knowledge and belief.

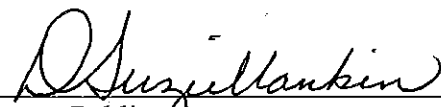
Further the Affiant sayeth not.

  
\_\_\_\_\_  
KATHLEEN A. McNELIS, PE

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 12<sup>th</sup> day of November 2025.



  
\_\_\_\_\_  
Notary Public

**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 )

**AFFIDAVIT OF ZACHARY MILLSAP**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

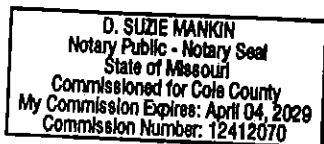
COMES NOW ZACHARY MILLSAP and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

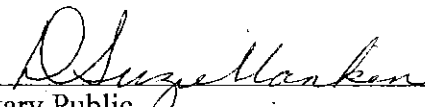
Further the Affiant sayeth not.

  
\_\_\_\_\_  
ZACHARY MILLSAP

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 10<sup>th</sup> day of November 2025.



  
\_\_\_\_\_  
Notary Public