

**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)	Case No. GS-2025-0068
Natural Gas Incident in Independence, Missouri)	

RESPONSE TO GAS INCIDENT REPORT

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”), and respectfully submits this *Response to Gas Incident Report* (“Response”) to the Missouri Public Service Commission (“Commission”), stating the following:

1. On August 28, 2024, Staff of the Commission (“Staff”) filed a motion to establish a case and open an investigation into a natural gas incident in Independence, Missouri.
2. On September 5, 2024, the Commission granted Staff’s request and issued an order opening an investigation.
3. Staff conducted its investigation, issuing numerous data requests to the Company, before filing its Gas Incident Report (“Report”) on October 3, 2025.
4. On October 7, 2025, Spire Missouri requested until November 14, 2025, to respond to the Report, which the Commission granted.

Summary of Facts

5. Spire Missouri has reviewed the facts contained in Staff’s Report and agrees with Staff’s description of the incident. On August 16, 2024, an excavator notified Missouri 811 of a planned excavation starting on August 21, 2024. On August 20, 2024, an employee of the Company’s contract locator responded to the 811 ticket. On August 26, 2024, the excavator struck Spire Missouri’s main with horizontal directional boring equipment and notified Company dispatch of a potential hit line after smelling gas. Spire Missouri crews responded to the scene, performing tests to locate the source of the gas, excavating at the point of the highest gas-in-air

concentration measurement, and identifying the damage to a 4-inch main. However, gas migrated to a nearby home and resulted in an explosion and fire at the home.

6. At the location of the damaged main, the Company observed two sets of markings parallel to each other. After further investigation, Spire Missouri found the contract locator employee marked one set using a tone from a test point and marked the other set using measurements from mapping information provided by the Company. The test point used was also not the closet test point to where the main was damaged. Contract locator employees are trained on Spire Missouri's standard operating procedures (SOPs"). The SOPs for locates require that lines be marked using toning from test points if present, measurements only be used as confirmation of tones, and to contact the Company for assistance when there is a conflict between tones and measurements.

7. Further, under the SOPs, contract locator employee shall place the best marks possible before closing a locate ticket and shall not place two sets of marks. At the location of the damaged main, one set of marks was no closer than 6 feet from the damaged main, while the other set of marks was no closer than 3 feet from the damaged main. The tolerance zone for locate markings is 2 feet on either side of the main. Spire has a three-strike rule for contract locator employees, at which point the specific contract locator employees are no longer able to perform locates for Spire for a period of 12 months. The specific employee in question received a third strike for this incident.

Alleged Violations

8. As a result of the incident, Staff has alleged three violations: (1) Spire failed to locate its underground facilities within the approximate location required; (2) Spire Missouri's Contract Locator failed to follow the Company's manual of written procedures for conducting operations and maintenance activities and for emergency response; and Spire Missouri failed to

ensure all work completed on its pipelines by its contractor is in compliance with the Commission's gas safety rules.

9. The Company does not dispute the facts leading to Staff's alleged violations and recognizes the contract locator was performing work on behalf of Spire Missouri. However, despite being trained on the SOPs, the contract locator's employee did not follow them and utilized measurements to mark, placed two markings, and failed to contact the Company for assistance. Had the contract locator's employee followed the SOPs, Spire Missouri believes the appropriate marks would have been placed within the approximate location required, and this incident would not have occurred.

10. As noted by Staff, the Company currently is implementing a plan pursuant to the Stipulation and Agreement reached in Case No. GC-2024-0305, ** [REDACTED]

[REDACTED] **. Although Staff did allege a violation around Spire Missouri's oversight of its contract locators, Staff also explained that it would not be making any recommendations related to the Company's oversight, opting to evaluate how the implementation of the plan above will affect locating performance.

Staff Recommendations

11. In its Report, Staff provided the following recommendations. After reviewing Staff's recommendations, the Company believes that the parties will be able to reach an agreement on each of the recommendations. The Company provides its initial response to each recommendation below and looks forward to working with Staff within the forthcoming formal complaint docket

12. *Recommendation 1:* Staff recommends that Spire provide quarterly updates to the Commission regarding the status of implementation for corrective action items 4 and 8 in

Confidential Table 2 of this report until the corrective action items have been completed satisfactorily. If either of the two identified corrective action items is no longer considered to be necessary by Spire, the reason(s) should be explained in the quarterly updates.

13. *Company Response:* Spire Missouri has completed corrective action items 4 and 8 and has provided updates to Staff regarding these corrective actions in its regular safety quarterly reports.

14. *Recommendation 2:* Staff recommends that Spire evaluate the circumstances involved with locating offsets in its gas facilities and provide additional training and guidance to its Contract Locator employees regarding how to accurately locate the offset. This should include locating segments of plastic main that are offset from steel mains, where there may or may not be a working tracer wire to use for electronic locate equipment. When the tracer wire is not working for conductive methods using electronic locate equipment or the measurements for Spire records are not available or clear, the process needs to be clear for how Contract Locator employees should proceed.

15. *Company Response:* Spire Missouri will evaluate the circumstances involved with locating active gas facilities in close proximity to abandoned facilities and determine what additional training and guidance should be provided to its Contract Locator.

16. *Recommendation 3:* Staff recommends that when Spire is able to observe the actual location of its gas facilities, including each instance when Spire or its contractor exposes buried gas facilities during operations and maintenance activities, that Spire verify and update its maps that are used by locating personnel and include electronic and GPS mapping coordinate information when appropriate. Updated maps should be provided to the contract locator.

17. *Company Response:* The Company's mapping of its facilities incorporates geographic information system (GIS) data, which are based on measurements, marker ball

locations, which are devices located within piping allowing facility locations to be pinpointed in the field, and global position system (GPS) coordinates. When existing facilities are exposed, the Company places marker balls and adds the locations to the Company's mapping system. The Company is starting its transition to GPS coordinates, currently adding GPS coordinates as it upgrades its infrastructure across the state. Finally, when maps are updated, they are made available to contract locators.

18. *Recommendation 4:* Staff recommends that in instances when only road centerline measurements are provided to determine the observed actual pipe location, Spire should add measurements or change to electronic and GPS mapping coordinates. Updated maps should be provided to the contract locator.

19. *Company Response:* The Company's preferred method of locating is conductive locating, and only when conductive locating is not available will an alternative method, such as road centerline measurement, be used. Instances when centerline measurements are used involve broken tracer wire, buried joint installations, service tees, and cast iron pipe. As mentioned above, Spire Missouri does add marker balls when facilities are exposed and is transitioning to GPS coordinates. While the Company is not sure whether this was Staff's recommendation, the Company does not believe it is appropriate to excavate and expose piping solely for the purpose of adding measurements or GPS coordinates when only centerline measurements are available.

20. *Recommendation 5:* Staff recommends that Spire revise SOP 220.R to use a distance of no greater than two feet in the procedure stating: **

21. *Company Response:* The Company agrees to adjust 220.R to match the tolerance zone provided in the Company's SOPs and 811's best practices.

22. *Recommendation 6:* Staff recommends that Spire provide a quarterly report to Staff of the “Quality Ratio” for each locating contractor that Spire utilizes in Missouri during that quarter. The report should include a quality ratio, calculated as contractor locate at fault damages divided by the total billable locates.

23. *Company Response:* The Company agrees with this recommendation.

24. *Recommendation 7:* Staff recommends that Spire provide annual summaries of the results of audits Spire performs on each of its contract locators. The annual summaries should include at a minimum the date of the audit, Missouri 811 ticket number, internal remarks or notes by the auditor, an indication of whether the locate passed or failed the audit, and identification of all corrective measures taken as a result of locates that failed the audit.

25. *Company Response:* The Company agrees with this recommendation.

26. *Recommendation 8:* Staff recommends that the Commission order Spire to file an action plan, by January 9, 2026, which addresses the recommendations (numbered 1-7). Staff further recommends that the Commission order Spire to include in its action plan filing when it will effectuate that action plan. Finally, Staff recommends: A. The Commission require that the action plan include Spire’s proposed resolution for addressing each recommendation and the timeframe for implement the resolution. B. The Commission require Spire to file updates every six months as to how the plan has been effectuated.

27. *Company Response:* Spire Missouri looks forward to working with Staff on its recommendations in the forthcoming formal complaint docket and is not opposed to an action plan to implement the final recommendations from that docket.

Submitting Report to Missouri AGO

28. In addition to the above recommendations, Staff requests Commission authorization to submit a redacted (public) copy of this investigation report to the Missouri

Attorney General's Office ("AGO") as information that may be used in the event the AGO wishes to take further action as provided in Section 319.045, RSMo.

29. As discussed above, this incident and investigation stems from the actions of the Company's contract locator, which the Company has held at-fault. Spire Missouri is actively working to address the locate timeliness and performance issues presented by the contract locator and appreciates Staff's recognition of this fact. Should the Commission authorize the submittal of the investigation report, Spire Missouri requests the opportunity to provide suggestions on any cover document accompanying the Report.

WHEREFORE, Spire Missouri respectfully requests the Commission accept this Response and order any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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ATTORNEY 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 14th day of November, 2025.

/s/ J. Antonio Arias

J. Antonio Arias