

**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>Case No. GS-2025-0068</u></b>
Independence, Missouri	)	

**STAFF RESPONSE**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and in response to the Commission’s November 18, 2025, *Order Directing Filing* states:

1. On August 28, 2024, Staff filed a Motion to Establish a Case requesting the Commission open a file for investigation of a natural gas pipeline incident in Independence, Missouri. The Motion described an incident that occurred on August 26, 2024, in Independence, Missouri, an area served by Spire Missouri Inc., d/b/a Spire (“Spire”). A third-party excavator installing fiber optic cable by directional drilling hit Spire’s nearby 4-inch natural gas main. The natural gas migrated into the house and ignited, resulting in an explosion and house fire.

2. On September 5, 2024, the Commission granted Staff’s Motion and ordered Staff to file a report regarding the incident.

3. On October 3, 2025, Staff filed its *Staff’s Gas Incident Report* (“*Staff’s Report*”) with the Commission.

4. On November 14, 2025, Spire filed its *Response to Gas Incident Report* (“*Spire’s Response*”) with the Commission; wherein, it stated it had concerns with Staff’s recommendation number 4.

5. On November 18, 2025, the Commission ordered Staff to file a response to Spire’s concerns with recommendation four of *Staff’s Report* no later than December 4, 2025.

6. Staff has reviewed Spire's Response and hereby submits Staff's Response as set forth in Appendix A, which is incorporated by reference herein. Staff's Response is set forth more fully in the attached Memorandum, Appendix A.

7. Staff's recommendation number 4 states as follows:

"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. (See Section III.D - Damage Prevention Program of this report)." <sup>1</sup>

8. Spire's concern, as stated in its Response, is as follows:

"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."<sup>2</sup>

9. In Recommendation 4, Staff did not intend that additional excavations and measurements be made solely for the sake of having such measurements, but instead to address a potential source of confusion and inaccuracy in determining the actual locations of Spire's underground pipelines prior to the commencement of nearby excavation work. Specifically, to address the potential for errors when the only available measurement of a pipeline location is from a road centerline as discussed in Staff's Report, pages 27-31.

10. Staff proposes to address Spire's concern regarding the purpose, scope and wording of Staff Recommendation 4 by substituting the following Amended Staff Recommendation 4 for Staff Recommendation 4 in the Complaint:

"Staff recommends that in instances when Spire is able to observe the actual location of a Spire gas facility for which the only documented measurement of the pipeline location is from a road centerline, in addition to verification of the accuracy of this measurement (Staff Recommendation 3), Spire obtain and add to its records measurements of distance from the pipeline to additional

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<sup>1</sup> From page 55 of Staff's Report.

<sup>2</sup> From Paragraph 19 of Spire's Response.

landmarks, or change to electronic and GPS mapping coordinates. Updated maps should be provided to the contract locator. (See Section III.D - Damage Prevention Program of this report).”

11. Staff further sets forth a response and its concerns on Spire’s comment on Commission Order Item 4, in its Response, with proposed language to address its concerns in Appendix A.

**WHEREFORE**, Staff respectfully submits and requests the Commission accept the attached Staff’s Response as set forth in Appendix A, and order Spire to respond to Staff’s response no later than December 18, 2025, 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 3rd day of December, 2025.

**/s/ J. Scott Stacey**