

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

In the Matter of the Application of Spire )  
Missouri Inc. for a Variance from )  
Standards of Quality Rule. )

Case No. GE-2026-0249

**RESPONSE TO STAFF RECOMMENDATION**

**COMES NOW** Spire Missouri Inc. (“Spire Missouri” or “Company”), and submits this response to the *Staff Recommendation*, stating the following:

1. On March 25, 2026, Spire Missouri filed an application for a waiver of Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-10.030(10)(J) to allow the Company to accept renewable natural gas (“RNG”) from an RNG project at a temperature of 120 degrees Fahrenheit, which exceeds the maximum delivery temperature of 100 degrees Fahrenheit set by the Commission. The Company also requested a waiver of the 60-day notice rule and moved for expedited treatment.

2. On March 25, 2026, the Commission set the deadline for Staff of the Commission (“Staff”) to issue its recommendation as April 3, 2026, and directed responses to Spire Missouri’s application and the *Staff Recommendation* to be filed no later than April 6, 2026.

3. On April 3, 2026, Staff issued its recommendation. Staff recommended that the Commission grant the waiver requested by the Company for the single project identified in the application, subject to the five conditions recommended by Staff. Staff also recommends the Company perform an analysis for the specific location where RNG will be injected prior to accepting RNG on its system.

4. Spire Missouri agrees with Staff’s recommendation that the waiver should be approved for the specific project identified in the application. The Company has performed the Staff’s recommended analysis and attached it as **Appendix A**. As described below and in the

attached Appendices, the RNG project will be connected to Spire Missouri's existing distribution system by an approximately 4,500-foot steel outlet pipe, constructed by the Company. At the tie-in to the existing distribution system, if the RNG starts at 120 degrees Fahrenheit, the expected temperature based on modeling is anticipated to be approximately 93.47 degrees Fahrenheit, as shown in **Appendix B**.<sup>1</sup> The Company also accepts all of Staff's conditions and provides the following responses to Condition A and Condition B.

5. For Condition A, Spire Missouri has attached **Appendix C** and **Appendix D**,<sup>2</sup> which show the specific location where RNG will be injected into its system.

6. For Condition B, and as explained in Appendix A, there are no plastic materials within the distribution system into which RNG will be injected at a temperature that may exceed 100 degrees Fahrenheit. There will be an approximately 4,500-foot outlet pipe from the RNG Project to the Company's existing distribution system. At this connection point, which is to steel main, the temperature of the gas will be approximately 93.47 degrees Fahrenheit. There are no other connection points, either to steel or pipe facilities, prior to this point.

7. As stated in its application, the requested waiver will not compromise gas safety or the integrity of the Company's facilities.

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<sup>1</sup> This appendix is confidential pursuant to 20 CSR 4240-2.135(2)(A) 7 as it relates to the security of the Company's facilities.

<sup>2</sup> These appendices are confidential pursuant to 20 CSR 4240-2.135(2)(A) 7 as they relates to the security of the Company's facilities.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission accept this response, grant the requested waiver of 20 CSR 4240-10.030(10)(J), the requested waiver of the 60-day notice rule, and the motion for expedited treatment, 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 by electronic mail to all counsel of record on this 6th day of April, 2026.

*/s/ J. Antonio Arias*

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