

## UPDATED MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File,  
Case No. GE-2026-0249, Spire Missouri, Inc.

**FROM:** Clinton Foster, Associate Engineer, Safety Engineering Department  
Kathleen McNelis, P.E., Safety Engineering Department

/s/ Kathleen McNelis, P.E. / 04/10/2026  
Safety Engineering Department / Date

**SUBJECT:** Staff’s Updated Recommendation Regarding Request by Spire Missouri Inc. for  
Waiver from Requirement of Commission Rule 20 CSR 4240-10.030(10)(J) –  
Gas Temperature.

**DATE:** April 10, 2026

### **1.0 Background**

Spire Missouri Inc. (“Spire”) submitted its application for a variance from the Standards of Quality Rule, Request for Waiver from 60-Day Notice Rule, and Motion for Expedited Treatment (“Application”) on March 25, 2026. Spire specifically requested a variance for the present interconnection and all future interconnections; however, Spire also indicated a willingness to accept a variance for just the present interconnection.<sup>1</sup>

In its Application, Spire states that it provided a specification sheet for Renewable Natural Gas (RNG) to developers that included a gas delivery temperature range between 40 °F and 120 °F. Spire notes that this is the temperature range allowed on interstate pipelines.<sup>2</sup> Spire additionally states that the RNG facility was designed for a maximum delivery temperature of 120 °F, however, the actual normal delivery temperature is unknown until the plant is operational.<sup>3</sup>

Commission Rule 20 CSR 4240-10.030(10)(J), effective date May 30, 2025, specifies a temperature range between 40 °F and 100 °F for RNG delivered to customers.

The Commission ordered that no later than April 3, 2026, Staff file either a recommendation regarding Spire’s Application or a status report indicating when it expected to file a recommendation.

---

<sup>1</sup> Paragraph 11 of Spire’s Application.

<sup>2</sup> Paragraph 7 of Spire’s Application.

<sup>3</sup> Paragraph 9 of Spire’s Application.

Staff filed its *Staff Recommendation Regarding Request by Spire Missouri Inc. for Waiver from Requirement of Commission Rule 20 CSR 4240-10.030(10)(J) – Gas Temperature* Memorandum (“Staff Memorandum”) on April 3, 2026, recommending that the Commission grant the waiver subject to five conditions. To accommodate Spire’s request for expedited treatment of its application, Staff also outlined a procedure by which Spire could demonstrate to the Commission either that there will be no detrimental effects of elevated gas temperature on the gas distribution system or that pressure reduction will be needed prior to injection of renewable natural gas into the gas distribution system at elevated gas temperatures.

On April 6, 2026, Spire filed its Response to the Staff Memorandum (“Spire’s Response”), stating that it had performed Staff’s recommended procedure and provided the results. Spire also stated that it accepts Staff’s five recommended conditions to the granting of a variance.

On April 7, 2026, the Commission ordered Staff to review Spire’s Response and file an updated recommendation by April 10, 2026, regarding Spire’s application, or a request for an extension of time by which to file its recommendation. The Commission ordered any other parties wishing to file a response to do so no later than April 10, 2026.

## **2.0 Staff Review of Spire’s Response**

In its April 3, 2026, Staff Memorandum, Staff recommended that the Commission grant the waiver subject to five conditions. Staff’s review of Spire’s Response pertaining to these conditions is summarized below.

### **A. Specific Location for RNG Injection into Spire’s Distribution System**

Staff’s intention in recommending conditions A. and D. in *Section 4.0 – Staff Recommendation to the Commission* of its April 3, 2026, Staff Memorandum was to enable the clear identification of the location for purposes of limiting the applicability of the waiver to this specific location.

In Spire’s Response, Spire provided Confidential Appendices C and D,<sup>4</sup> showing the specific location where RNG will be injected into Spire’s distribution system.

Staff’s updated recommended condition to identify this specific tie-in location is provided in *Section 3.0* of this Memorandum.

---

<sup>4</sup> Spire stated that these appendices are confidential pursuant to 20 CSR 4240-2.135(2)(A) 7 as they relate to the security of Company facilities.

B. Plastic Materials Potentially Exposed to Elevated Temperatures.

Staff's intention in recommending conditions B., C., and E. in *Section 4.0 – Staff Recommendation to the Commission* of its April 3, 2026, Staff Memorandum was to ensure that potential detrimental effects to plastic pipe or components were identified and mitigated prior to introduction of RNG at elevated temperatures into the distribution system.

Spire provided modeling results in Confidential Appendix B to Spire's Response, indicating that the expected temperatures at the tie-in location to the distribution system shown in Confidential Appendix D to Spire's Response would be approximately 93.47 °F. Staff notes that this modeling result \*\*

[REDACTED]

[REDACTED]

\*\* . Staff notes that the relative locations of the \*\*

[REDACTED]

[REDACTED]

[REDACTED] . \*\* To address these uncertainties, Staff has included additional recommended conditions related to expedited investigation and repair of leaks in *Section 3.0* of this Memorandum. Staff's rationale behind these recommended conditions is that if temperature is negatively affecting nearby plastic

pipeline segments or components, it is important to determine this quickly so that mitigative actions can be implemented.

Staff additionally notes that Spire did not seek a waiver from the requirements of 20 CSR 4240-10.030(11) to continuously monitor outlet temperature, or from 20 CSR 4240-10.030(12) to isolate RNG from entering the system if temperature is exceeded. Staff therefore assumes that, while not stated in Spire's Application, Spire does intend to continuously monitor and control the temperature of gas entering the RNG facility steel outlet piping from the RNG Facility to no greater than 120 °F. This assumption has been added as a condition in *Section 3.0* of this Memorandum.

### **3.0 Staff's Updated Recommendation to the Commission**

Staff recommends that the Commission grant the waiver requested by Spire for the single project identified in its Application subject to the following conditions:

- A. This waiver is only applicable to RNG injected at the location shown in Confidential Appendices C and D to Spire's Response filed on April 6, 2026, in Case No. GE-2026-0249.
- B. Each Spire detected leak indication or any leak notification from the general public, police, fire or other authorities or notification of damage to facilities by contractors or other outside sources at any pipe location shown on Confidential Appendix C to Spire's Response shall require immediate investigation and classification as required in Commission Rule 20 CSR 4240-40.030(14)(B)1. Leaks shall be repaired as required in Commission Rule 20 CSR 4240-40.030(14)(C), except that any Class 2<sup>5</sup> and Class 3<sup>6</sup> leaks must be repaired within 15 days. Each Class 1<sup>7</sup> leak requires immediate corrective action;
- C. Each leak found on Spire piping at any location shown in Confidential Appendix C to Spire's Response shall be reported to Commission Staff within 24 hours of discovery.
  - a. If a leak occurs on plastic pipe shown in Confidential Appendix C, the leaking segment of plastic pipe shall be removed and retained for observation and potential laboratory analysis.

---

<sup>5</sup> Commission Rule 20 CSR 4240-40.030(14)(C)2. defines Class 2 as "a leak that does not constitute an immediate hazard to a building or to the general public, but is of a nature requiring action as soon as possible." Examples of Class 2 leaks from the rule are "a leak from a transmission line discernable 25 feet or more from the line and within 100 feet of a building" and any leak indication "that is outside a building at the foundation or within 5 feet of the foundation."

<sup>6</sup> Commission Rule 20 CSR 4240-40.030(14)(C)3. defines Class 3 as "a leak that does not constitute a hazard to property or to the general public but is of a nature requiring routine action."

<sup>7</sup> Commission Rule 20 CSR 4240-40.030(14)(C)1. defines Class 1 as a "leak which, due to its location and/or magnitude, constitutes and immediate hazard to a building and/or the general public."

- b. If a leak occurs on steel pipe shown in Confidential Appendix C, a leakage survey will be performed on all Spire facilities installed within a 100-foot radius of the leak location to evaluate potential for damage to other nearby pipes.
- D. Spire shall continuously monitor and control the temperature of gas accepted from the RNG facility as provided in 20 CSR 4240-10.030 Sections (10), (11) and (12), except that the maximum temperature of gas may exceed 100 °F but shall not exceed 120 °F in the steel pipeline identified as \*\* [REDACTED] \*\* in Confidential Appendix C to Spire's Response.
- E. Prior to connecting any new or existing plastic pipe or plastic components downstream of the RNG injection into this distribution system in the future, Spire must first determine the Design Pressure limits for the newly connected pipe at the temperature anticipated at the installation location, and
- F. If following start up and initial operation of the RNG system Spire learns that the maximum gas temperature can be controlled to 100 °F or lower, Spire may request that the waiver be rescinded.





**Case No. GE-2026-0249**

**INFORMATION CONTAINED IN**

**THIS APPENDIX HAS BEEN DEEMED**

**CONFIDENTIAL**

**IN ITS ENTIRETY**