

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Spire)
Missouri Inc. d/b/a Spire for a Variance) **Case No. GE-2026-0249**
from Standards of Quality Rule)

ORDER APPROVING APPLICATION FOR VARIANCE

Issue Date: April 13, 2026

Effective Date: April 23, 2026

On March 25, 2026, Spire Missouri Inc. d/b/a Spire filed an application requesting a variance from Commission Rule 20 CSR 4240-10.030(10)(J) on Standards of Quality specifying that renewable natural gas (RNG) delivered to customers be at a temperature between 40°F and 100°F. Spire also requested a waiver of the 60-day notice requirement of Commission Rule 20 CSR 4240-4.017(1) and expedited treatment of its application pursuant to Commission Rule 20 CSR 4240-2.080(14), stating that the RNG developer with which it had an interconnection agreement anticipated being ready to inject RNG into Spire’s distribution system as soon as April 15, 2026.

In its application, Spire stated that the RNG developer’s facility “was designed and approved for a maximum delivery temperature of 120°F, however, the actual normal delivery temperature is unknown until the plant is operational. The temperature will not exceed 120°F, however, based on the project design, may be above 100°F.”¹

Spire’s requested variance from Commission Rule 20 CSR 4240-10.030(10)(J) was for the present interconnection agreement described in its application and for all future interconnections involving steel interconnection and distribution piping. However,

¹ *Application for Variance from Standards of Quality Rule, Request for Waiver from 60-Day Notice Rule, and Motion for Expedited Treatment (Application)* (filed March 25, 2026), p. 3.

Spire indicated that, in the alternative, it would accept the variance for just the present interconnection agreement.²

The Commission set a deadline for intervention applications and directed its Staff to file a recommendation on Spire's application. No entities applied to intervene.

On April 3, 2026, Staff filed a recommendation in which it recommended the Commission grant the variance requested by Spire for the single interconnection project described in Spire's application, 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 Staff Recommendation* (Response), stating that it had performed Staff's recommended procedure and provided the results. Spire also stated that it accepted Staff's five recommended conditions to the granting of a variance.

On April 10, 2026, at the request of the Commission, Staff filed an *Updated Staff Recommendation*, taking into consideration Spire's Response and subsequent discussions with Spire representatives. Staff recommended that the Commission grant the variance requested by Spire for the single interconnection project described in Spire's application, subject to six conditions. No responses were filed by the April 10th deadline set by the Commission.

² Application, p. 4.

The Commission has reviewed the pleadings in this case and will grant the requested variance for the present interconnection project only, subject to the conditions recommended by Staff. The Commission also will grant Spire's request for waiver of the 60-day notice requirement, finding good cause exists to waive the requirement based on Spire's verified declaration that it had no communication with the Commission regarding substantive issues in the application within 150 days before its filing.³ Finally, in order to accommodate the possibility of injection of RNG into Spire's distribution system as soon as the RNG developer is ready to do so, the Commission finds it reasonable to make this order effective in less than 30 days.

THE COMMISSION ORDERS THAT:

1. Spire's application for a variance from Commission Rule 20 CSR 4240-10.030(10)(J) is granted for the present interconnection project described 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 25 and Class 36 leaks must be repaired within 15 days. Each Class 17 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.

³ Commission Rule 20 CSR 4240-4.017(1)(D).

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.

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 ** CONFIDENTIAL ** 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.

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.

2. The 60-day notice requirement of Commission Rule 20 CSR 4240-4.017(1)

is waived for good cause.

3. This order shall be effective on April 23, 2026.

4. This file shall close on April 24, 2026.

BY THE COMMISSION



Nancy Dippell

Nancy Dippell
Secretary

Kenneth J. Seyer, Senior Regulatory
Law Judge, by delegation of authority
pursuant to Section 386.240, RSMo 2016.

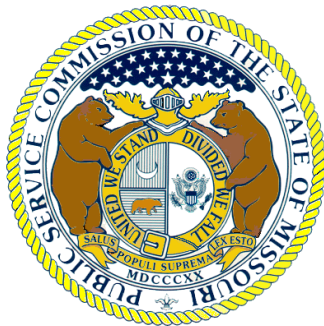
Dated at Jefferson City, Missouri
on this 13th day of April, 2026.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 13th day of April 2026.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

April 13, 2026

Case No: GE-2026-0249

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).¹

Sincerely,



**Nancy Dippell
Secretary**

¹

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.