

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

In the Matter of the Proposed Amendments	)	
of the Commission's Rules 20 CSR 4240-	)	<u>File No. GX-2026-0285</u>
40.020 and 20 CSR 4240-40.030 Relating to	)	
Gas Safety	)	

STAFF COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff")
and states as follows:

1. Staff supports the proposed amendments to 20 CSR 4240-40.020 and 20 CSR 4240-40.030, published in the Missouri Register dated June 1, 2026. The proposed amendments include adoption of amendments to the corresponding federal pipeline safety standards, and make clarifications and editorial/technical changes to the Missouri gas safety rules.

2. Federal law requires that the state take measures to adopt each applicable federal pipeline safety standard within a prescribed period of time.¹ Goals are set for state programs by the Pipeline and Hazardous Materials Safety Administration (PHMSA) and enforcement of those goals is by reductions in federal grant-in-aid funding and the potential loss of federal certification² if those goals are not met.

¹ 49 U.S. Code § 60105 requires, among other things, that the state authority adopt each applicable federal pipeline safety standard by the date of its annual certification, or in the event a standard was established within 120 days before the date of the certification, be taking steps to adopt that standard.

² The Commission's Safety Engineering Department Staff is granted authority to implement the state pipeline safety program by annual certification from the United States Department of Transportation (DOT).

WHEREFORE, Staff respectfully submits these comments for the Commission's consideration and supports the proposed amendments to 20 CSR 4240-40.020 and 20 CSR 4240-40.030.

Respectfully submitted,

/s/ J. Scott Stacey

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**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 30th day of June, 2026.

/s/ J. Scott Stacey