

Docket No. GW-2021-0272
Working Case for the Review and Consideration of
Amending the Commission's Natural Gas Safety Rules
Questions Related to Revision of (12)(S)1.B.
Attachment A

Responding Operator: **Spire Missouri Inc.**
Name of Person Responding: Randy Wilson
Contact Information:

A. General

During the COVID-19 pandemic, it was brought to Staff's attention that in some circumstances, customers were reluctant to allow operators access to homes to perform visual inspections of accessible customer gas piping and connected equipment required by 20 CSR 4240-40.030(12)(S)1.B. The Commission granted a temporary waiver from this requirement in File No. GE-2020-0297, subject to certain conditions.

General Questions:

1. Did your City/Company make use of this waiver at any time during the pandemic? (Yes/No)
Spire did not make use of this waiver during the pandemic.

If "yes":

- a. Approximately how many times have you made use of the waiver? **N/A**
- b. Please explain any negative consequences that you are aware of as a result of making use of the waiver. **N/A**

2. Do you foresee any future need to seek relief from the requirements of 20 CSR 4240-40.030(12)(S)1.B. going forward? If "yes", please explain.

Spire does not foresee future need to seek relief from the requirement of 20 CSR 4240-40.030(12)(A)1.B because Spire has a company standard to do the piping inspection beyond the meter at a turn on and therefore does not anticipate a need for such a waiver.

3. Do you have any additional comments related to the requirements of 20 CSR 4240-40.030(12)(S)1.B.?

Spire appreciates Staff's attempt to address this potential need, but Spire was not able to take advantage of it and sought its own waivers that were more effective for its operations and customers.

B. Specific

A possible amendment to the requirement of 20 CSR 4240-40.030(12)(S)1.B. would be to extend the existing exemption for large commercial or industrial customers denying access to residential and small commercial customers as drafted below.

(S) Providing Service to Customers.

1. At the time an operator physically turns on the flow of gas to a customer (see requirements in subsection (10)(J) for new fuel line installations)—

A. Each segment of fuel line must be tested for leakage to at least the delivery pressure; and

B. A visual inspection of the exposed, accessible customer gas piping, interior and exterior, and all connected equipment shall be conducted to determine that the requirements of any applicable industry codes, standards, or procedures adopted by the operator to assure safe service are met. This visual inspection need not be met for emergency outages or curtailments. In the event a *[large commercial or industrial]* customer denies an operator access to the customer's premises, the operator does not need to comply with the above requirement if the operator obtains a signed statement from the customer stating that the customer will be responsible for inspecting its exposed, accessible gas piping, and all connected equipment, to determine that the piping and equipment meets any applicable codes, standards, or procedures adopted by the operator to assure safe service. In the event the customer denies an operator access to its premises and refuses to sign a statement as described above, the operator may file with the commission an application for waiver of compliance with this provision.

Specific Questions:

1. Would you be in support of, or opposed to such an amendment to 20 CSR 4240-0.030(12)(S)1.B.? Please explain why you would be in favor of, or opposed.

Spire would support the amendment but would not anticipate using it.

2. Would you suggest any additional conditions be added to provide an exemption for residential or small commercial customers? If "yes" please explain the additional conditions.

No.

3. Please provide information on the fiscal impact an amendment to 20 CSR 4240-40.030(12)(S)1.B. would have on the operations of your City/Company.

There would not be a fiscal impact to Spire operations as a result of this amendment.

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Working Case for the Review and Consideration of
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Questions for Gas Operators – Public Leak Data
Attachment B

Responding Operator: **Spire Missouri Inc.**
Name of Person Responding: Randy Wilson
Contact Information:

1. Do you currently make information on active leak indications available to the public? (yes/no).

- a. If “no”, please continue to Question 2.
No.
- b. If “yes”, please provide input on the following:
 - i. Please provide a description of what information is made public, and provide a recent example.
 - ii. Please explain how the information is provided (e.g., website, mailings, on request).
 - iii. Please explain how frequently the information is updated.

2. Do you currently make information on repaired leaks publically available? (yes/no).

- a. If “no”, please continue to Question 3.
No.
- b. If “yes”, please provide input on the following:
 - i. Please provide a description of what information is made public, and provide a recent example.
 - ii. Please explain how the information is provided (e.g., website, mailings, on request).
 - iii. Please explain how frequently the information is updated.
 - iv. Please explain how long the information is retained following the repair date of the leak.

3. If a member of the public contacts you and requests information on active or repaired leaks near a specific location, what information, if any, do you currently provide?

The Company will only provide active or repaired leaks information that is specific to a customer’s premise.

4. What are your current capabilities to make active leak indications publicly available?

- a. Please explain your current process for tracking active leak indications.

The Company tracks active leaks in the Company’s Asset Management System and plots them on the internal system map.

- b. Please explain to what extent active leak indications data is input into an electronic database.

Active leak indications data are maintained in the Company’s electronic data management system.

c. Please explain to what extent active leak indications are digitized into mapping, or other systems that visually indicate geographic locations.

All leak indications are plotted into an internal mapping and scheduling system.

5. What are your current capabilities to make information on repaired leaks publically available?

a. Please explain your current process for tracking repaired leaks.

The Company tracks leak repair records in its internal Asset Management System and plots them in the Company's internal mapping system.

b. Please explain to what extent leak repair data is input into an electronic database.

All leak repairs are entered electronically.

c. Please explain to what extent leak repairs are digitized into mapping, or other systems that visually indicate geographic locations.

All repairs are plotted in the Company's internal mapping system.

6. Please describe any benefits you see to making active or repaired leak information publicly available.

Spire does not support making active or repaired leak information publicly available because it creates too much risk and inhibits its statutory duty to provide safe and adequate service to its customers. Please see Spire's response to Question 7 below for the risks that could come from making active or repaired leak information publicly available.

7. Please describe any concerns you have regarding making active or repaired leak information publicly available.

As Spire stated in its April 9, 2021 filing, Spire does not support Staff's proposal to make this information public. Spire believes this would make both the Commission's statutory duty and Spire's statutory duty impossible to uphold. The Commission has a duty to promote and safeguard the health and safety of the public. Section 386.310 RSMo. The utilities have a statutory duty to provide safe and adequate gas service to its customers at just and reasonable rates. Section 393.130, RSMo. Information relating to the security of a company's facilities is confidential. See 20 CSR 4240-2.135 (2)(A)(5). Allowing public access to active leaks and leak repairs creates a serious risk of interference with the system.

Spire believes such a requirement would jeopardize the safety of the Missouri citizens because it would give access to highly confidential information about gas pipelines to the general public. There is no way to control what the public will do with that information, and the risk of an attack on the natural gas system is far too great if this information is made publicly available.

Spire is aware of all the pertinent information when it determines what leaks need to take priority in any given moment. Pertinent information includes construction projects, meter change-outs, system checks, just to name a few. This spectrum of information allows the Company to prioritize which leaks need to be addressed, what Spire resources are available and needed to respond to the situations, and which leaks are not imminently detrimental. Providing limited, isolated information to the public does not serve the public interest. It has the potential to create a vacuum of incomplete information, that is likely to be oversimplified and could provide an erred perception that all leaks are equal. It also creates unjustified fear in the residents. If the public had access to this information and saw a leak in their neighborhood, there is the potential that they would get scared and worried about their family and friends and would call the Company and expect Spire to come out immediately to address their concern. Those calls could unjustifiably divert resources from the priority situations and put the system and its customers at real risk.

In addition, there is concern that making leak information publicly available could result in customers not reporting gas odors. In the interest of public safety, gas odors should be reported every time. However, if an active portal exists, a person that smells gas may choose to look up whether a leak is already identified in the system at that location, find one and make an assumption that the leak is being addressed, and not take the opportunity to call a new one in to be investigated. The leak parameters may have changed, therefore causing a greater smell and needs

to be revisited before the original leak is scheduled for repair. Therefore, the new call without knowledge of an existing leak would be a safer position for the industry.

Providing that information to the general public creates too much room for the public to misunderstand, over-react, and creates unwarranted concern for the residents of Missouri.

8. If the Commission were to require that active or repaired leak information be made publicly available, how often would you be able to update that information for the gas system(s) you operate?

It is unknown by the Company at this time how often it would be able to update the information so that it may be made publicly available. For security reasons, Spire would not be able to share its internal mapping system directly with the public so this information would likely need to be manually entered on a different system for the public. The frequency by which this could occur is dependent on Company resources.