

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

In the Matter of an Investigation into )  
Summit Natural Gas of Missouri, Inc. )  
Concerning a Natural Gas Incident In )  
Branson, Missouri )

**File No. GS-2025-XXXX**

## **STAFF'S MOTION TO ESTABLISH A CASE**

**COMES NOW** the Staff of the Missouri Public Service Commission (hereafter the “Staff” or Commission”), by and through counsel, and for its Motion to Establish a Case states as follows:

1. Pursuant to Section 386.310 of the Revised Statutes of Missouri (“RSMo”), the Commission has the authority to require every gas utility, including municipal gas systems, to operate its system in a manner that promotes and safeguards the health and safety of its employees, customers, and the public.

2. The Commission has jurisdiction to regulate gas pipeline safety under Section 386.310, RSMo.

3. A public utility that owns any gas plant is subject to the provisions of Section 386.572, RSMo., for violation of any law, order, decision, decree, rule, direction, demand, or requirement of the Commission. § 386.572, RSMo.

4. Summit Natural Gas of Missouri, Inc. ("SNGMO") is a public utility under Section 386.020, RSMo.

5. SNGMO Missouri owns and operates a gas plant and is subject to the provisions of Section 386.572, RSMo.

6. The monetary penalties for violations of such gas safety standards are set forth in Sections 386.572.2 and .3, RSMo and are considered “separate and distinct

offenses, regardless of whether such violations relate to the same incident. In the case of a continuing violation, each day's continuance thereof shall be a separate and distinct offense."

7. A reportable natural gas incident<sup>1</sup> occurred on February 24, 2025, in Branson, Missouri, an area served by SNGMO. A third-party excavator performing pavement cutting struck and damaged the natural gas service line to the Spark by Hilton Branson Meadows hotel located at 263 Shepherd of the Hills Expressway. Natural gas migrated into the hotel and ignited, resulting in an explosion and building fire. Preliminary reports from emergency responders indicate that multiple individuals were injured, and that one or more may have been hospitalized overnight.

8. Two Safety Engineering Department Staff members visited the incident location on February 24 and 25, 2025, to observe utility locate markings and discuss the work being performed, events leading up to the incident, and actions taken by SNGMO in response to the incident. Staff intends to further investigate SNGMO's actions for compliance with applicable federal pipeline safety standards, and compliance with applicable commission rules and Missouri statutes.

9. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Department.

10. Staff further recommends the Commission direct that the report, or a status report, be filed by May 30, 2025.

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<sup>1</sup> See 20 CSR 4240-40.020(3) and (4) for reporting requirements.

**WHEREFORE**, for the reasons set forth above, Staff respectfully requests the Commission establish a case for the purpose of receiving a report, or status report, as described herein, and for any other such orders and relief as it deems just and appropriate under the circumstances.

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 3<sup>rd</sup> day of March, 2025.

**/s/ J. Scott Stacey**