

**Missouri Office of Public Counsel – Data Request Response – Case Nos.  
GO-2018-0309 and GO-2018-0310**

**8501. For each claimed ISRS qualifying project, list the specific state or federal safety regulation that mandated the replacement work to be done.**

Pursuant to agreement with OPC, Appendix A contains the safety requirement for each ISRS project.

**8502. Specify the state or federal safety regulation that mandates each and every main relining project, service line insertion project, or joint encapsulation project that Spire East and Spire West is claiming as ISRS qualifying.**

See Response to Question 1 above.

**8503. For relocations claimed to be ISRS qualifying, specify the entity and provide all documentation that required each relocation on behalf of the United States, the State of Missouri, or political subdivision of the State of Missouri, or other entity with eminent domain power, including, but not limited to, all Missouri Highways and Transportation Commission Utility Agreements.**

Please see Spire's objection letter dated July 23, 2018.

**8504. Please identify and provide all work orders that are considered "blanket" work orders for service "renewal."**

Please see the attached PDF files for Spire East and West. It should be noted that blanket work orders do not close and there is the potential that information contained within these orders, particularly dates, may not fall within the current ISRS period (October 2017 – June 2018); however, only ISRS eligible investments from this time period are included in the current ISRS filing and calculation.

**8505. Provide any and all documentation demonstrating the pipe being replaced is in a worn out or deteriorated condition.**

Please see Spire's objection letter dated July 23, 2018.

**8506. Provide copies of any and all testing or other analysis related to ID and OD of the pipe that was "renewed" and claimed as ISRS qualifying.**

Please see Spire's objection letter dated July 23, 2018.

**8507. What is the size pipe(s) of service lines being installed?**

OPC Exhibit No. 207  
Date 8/27/18 Reporter SLB  
File No. GO-2018-0309 & 0310  
GO-2017-0201 & 0202  
GO-2016-0332 & 0333  
0310

In most instances, service sizes being installed would be ½” and 1”, however, larger sizes may be installed based on load (1¼”, 2”, 4”) – these larger sizes are less typical.

**8508. Identify how retirement or “renewal units” are identified and selected for retirement? For example, is it by area, or type or size of pipe or pipe age?**

Main replacements areas are generally delineated by an overall risk mitigation approach and the area of influence from the regulator station that serves the area. Phases for these areas are created based on this review and available resources to complete the required work. The analysis includes a review of pipe operating and maintenance history to determine potential replacement areas.

**8509. Provide a copy of the Pipe Management Plan for both Spire East and Spire West.**

Please see the attached PDF maps and slide decks which include information on the Company’s plan, and its anticipated 2018-2020 projects.

**8510. For each project designate how many feet of each type of pipe (plastic, cast iron, copper, or steel) services and mains that were replaced.**

Please see the attached PDFs which contain work order information for projects over \$25,000. This information was also previously provided to Missouri PSC Staff when Spire circulated its initial ISRS application and model, as well as, when the Company circulated updated ISRS models with actual data for the months of May and June 2018.

**8511. Provide all documents demonstrating that Spire East and Spire West are in compliance with all PHMSA requirements.**

Please see Spire’s objection letter dated July 23, 2018.

**8512. Identify any information/documentation Spire East and Spire West ISRS added to the required supporting documentation provided in these filings which shows each project included meets the requirements of Section 393.1009(5) “Gas utility plant projects.”**

Please see Appendix A for both Spire East and West. Projects included in ISRS are all coded to reflect which requirement of Section 393.1009 (5) they satisfy.

**8513. Did Spire East and Spire West perform tests on service lines that were retired and replaced under ISRS that indicated lines were worn out or in deteriorated condition? If yes please provide the testing documentation for each project. If no please indicate that no testing was done.**

If it is economically and operationally feasible to reconnect a service line to a main that is being installed in connection with the Company’s cast iron and bare steel replacement programs, it will be reused. If it is not economically or operationally feasible to reconnect a service line to a newly installed main, a new service line will be installed. As the Company has repeatedly

demonstrated, such an approach does not result in any incremental increase in either the Company's ISRS costs and or the resulting ISRS charges but instead reduces them compared to the costs that would be incurred if an attempt was made to reuse service lines that cannot feasibly be economically or operationally reconnected to the main. Any effort to perform "tests" on service lines that cannot be economically or operationally reused would serve no purpose, but instead would be an unnecessary and imprudent expenditure of resources. Also see the response to DR 8505.

**8514. Please provide for Spire East and Spire West if any sub-section of each of the ISRS projects fall under in 4 CSR 240-40.030(15)(D)1.**

Please see Spire's objection letter filed July 23, 2018.

**8515. Has the Spire East and Spire West completed all replacements that fall under 4 CSR 240-40.030(15) (D)1 "high priority"? If not, please identify all "high priority" areas have not been addressed.**

As the Company has stated previously, the Company has addressed all high priority areas in the past, and it continues to prioritize them as they occur.

**8516. 4 CSR 240-40.030(15)(D)2. Requires a "long-term, organized replacement program and schedule shall also be established for cast iron pipelines not identified by the operator as being high priority. Has this plan been provided to the Commission's Gas Safety Staff? Please provide this plan and schedule to OPC for Spire East and Spire West or provide the EFIS item number and File number where these plans and schedules may be found.**

Please see the response to DR 8509.