

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

In the Matter of an Investigation into Spire)	
Missouri Inc. d/b/a Spire Concerning a)	Case No. GS-2025-0068
Natural Gas Incident in Independence, Missouri)	

SPIRE MISSOURI RESPONSE

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”), and respectfully submits this response to the Missouri Public Service Commission (“Commission”) December 4, 2025 *Order Directing Filing*, stating the following:

1. On August 28, 2024, Staff of the Commission (“Staff”) filed a motion to establish a case and open an investigation into a natural gas incident in Independence, Missouri.
2. On September 5, 2024, the Commission granted Staff’s request and issued an order opening an investigation.
3. Staff conducted its investigation and filed its Gas Incident Report (“Report”) on October 3, 2025.
4. Spire Missouri filed its response to the Report on November 14, 2025.
5. On November 18, 2025, the Commission directed Staff to respond to Spire Missouri’s response to Staff’s Recommendation 4.
6. On December 3, 2025, Staff provided an amended Recommendation 4 and requested that Spire Missouri provide suggestions on Staff’s draft email advising the Missouri Attorney General’s Office (“AGO”) of its Report, as well as a Company representative to be copied on such email.
7. On December 4, 2025, the Commission directed Spire Missouri to respond to Staff’s amended Recommendation 4, provide suggestions on Staff’s draft email, and provide a Company representative to be copied on such email.

Response to Staff December 3, 2025 Memorandum

8. Spire Missouri appreciates Staff providing clarity on its Recommendation 4, which is amended as follows:

Staff recommends that in instances when Spire is able to observe the actual location of a Spire gas facility for which the only documented measurement of the pipeline location is from a road centerline, in addition to verification of the accuracy of this measurement (Staff Recommendation 3), Spire obtain and add to its records measurements of distance from the pipeline to additional landmarks, or change to electronic and GPS mapping coordinates. Updated maps should be provided to the contract locator.

Spire Missouri agrees with this recommendation and will add to its standard operating procedures that marker balls be added to exposed facilities only locatable with a road centerline measurement.

9. Additionally, Spire Missouri recognizes its responsibility for its contractors and their actions. The incident is the result of an incorrect locate by the Company's contract locator, whose employee clearly did not follow the standard operating procedures that the Company has in place for its contract locators. Had the employee followed the standard operating procedures, which would have included reaching out to the Company for assistance, the incident may have been avoided. As noted in its November 14, 2025 response to the Report, the Company is taking action to address locate issues but also understands that it would be ultimately held responsible should the Commission find violations of Commission rules and applicable statutes.

10. Spire Missouri appreciates Staff and the Commission to allow the Company to provide suggestions to Staff's email to the AGO advising of the report. Spire Missouri provides its attached redlines to Staff's "Confidential Attachment 1" to its December 3, 2025 Memorandum.

11. For email transmissions to the AGO, the following Spire Missouri representatives should be included:

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WHEREFORE, Spire Missouri respectfully requests the Commission accept this response and order any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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ATTORNEY FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent either by mail or electronic mail to all parties of record on this 18th day of December, 2025.

/s/ J. Antonio Arias

J. Antonio Arias