

**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) **File No. GS-2025-0209**
Natural Gas Incident In)
St. Louis, Missouri)

STAFF’S REPORT AND RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (hereafter the “Staff”), by and through counsel, and herewith tenders its Report and Recommendation:

1. On January 21, 2025, Staff filed a Motion to Establish a Case requesting the Commission open a file for investigation of a natural gas pipeline incident in St. Louis, Missouri. The Motion described an incident that occurred on January 3, 2025, in the Glendale area of St. Louis, Missouri, an area served by Spire Missouri Inc. d/b/a Spire (“Spire”). A third-party excavator performing sewer repair work at 895 Glen Elm Drive, struck and damaged a natural gas service line. Natural gas migrated into the house, and ignited, resulting in an explosion and house fire.

2. On January 24, 2025, the Commission granted Staff’s Motion and ordered Staff to file a report regarding the incident or a report on the status of its investigation no later than April 30, 2025. Staff filed the ordered status report and has filed subsequent status reports advising the Commission of the progress of its investigation.

3. Staff has now completed its investigation and herewith tenders its Gas Incident Report (“Staff’s Report”), attached hereto as **Exhibit A.**

4. Staff’s Report describes its investigation, findings and recommendations fully and in detail. Staff found sufficient facts and information to support the conclusion that

Spire Missouri, Inc. violated applicable Commission Rules, federally adopted drug-and-alcohol testing requirements, and a prior Commission Order in the following respects:

a. Spire failed to take action to protect people first and then property, in violation of Commission Rule 20 CSR 4240-40.030(12)(J)1.E. Specifically, although Spire personnel were on site before the explosion, Spire's first actions were not directed toward determining whether natural gas had migrated inside the residence at 895 Glen Elm Drive, nor were they directed toward evacuating the people inside the residence before the gas explosion.

b. Spire failed to immediately take steps directed to protect the lives and physical safety of Company employees and the public, including by establishing a restricted zone, in violation of the Commission Order approving the Stipulation and Agreement in Case No. GC-2014-0216.

c. Spire failed to correctly mark the location of the service line to 895 Glen Elm Drive, in violation of Commission Rule 20 CSR 4240-40.030(12)(I)3.G.

d. Spire failed to follow its written program to prevent damage to its pipeline by excavation, in violation of Commission Rule 20 CSR 4240-40.030(12)(I)1. Specifically, that rule requires each operator of a buried pipeline to carry out a written damage-prevention program, and Spire's damage-prevention program includes compliance with Chapter 319, RSMo. Spire did not place locate markings on the ground surface above the natural gas main at the damage location prior to excavation as required by Section 319.030, RSMo; therefore, Spire failed to locate its underground facilities within the required "approximate location." In addition, Spire's Contract Locator did not follow Spire's contract-locator procedure, resulting in incorrect locate markings at the incident location.

e. Spire failed to timely perform post-incident alcohol testing of the Contract Locator who incorrectly located the service line before the incident and the four Spire employees who initially responded to the excavation-damage notification, in violation of 49 CFR 199.225(a)(1), as adopted by the Commission through 20 CSR 4240-40.080.

f. Spire failed to maintain a sufficient number of distribution-line valves necessary to isolate the portion of the distribution system feeding the service line to 895 Glen Elm Drive, in violation of Commission Rule 20 CSR 4240-40.030(13)(V)3.A.

5. Missouri gas utilities have a statutory duty to furnish safe and adequate service, instrumentalities, and facilities. That duty arises from Section 393.130, RSMo and is enforceable by the Commission through its supervisory authority under Section 393.140, RSMo. The Commission may examine the utility's methods of manufacturing, distributing, and supplying gas; investigate the safety and adequacy of facilities and service; prescribe standards for gas quality, pressure, and delivery; and order reasonable repairs, improvements, extensions, or replacements needed to promote the public interest, preserve public health, and protect gas users. The duty is further implemented through Commission gas-safety rules requiring, among other things, leak detection, corrosion control, emergency response procedures, incident reporting, pipeline replacement when facilities become unsafe, and distribution integrity management. The Commission's focus is regulatory compliance and safe-and-adequate service, not common-law negligence or damages.

6. It is Staff's counsel's conclusion that Spire's conduct in this case violated its duty to provide safe and adequate service as mandated by Section 393.130, RSMo.

7. Staff's recommendations are set out fully and in complete detail in Staff's Report.

8. Staff has identified violations of the Commission's pipeline safety standards as promulgated in 20 CSR 4240-40.030 and 20 CSR 4240-40.080 that are set out in Staff's Gas Incident Report, which warrant the filing of a Complaint against Spire. The Gas Incident Report also sets out recommendations related to the violations of the Commission's pipeline safety standards as set forth in 20 CSR 4240-40.030, as well as recommendations related to 20 CSR 4240 40.080. Staff will address these violations and recommendations in the Complaint addressed above.

9. Moreover, Staff requests approval for Staff to report the incident to the Missouri Attorney General's Office ("AGO") and provide a public copy of the incident report to the AGO for purposes of further action by the AGO, if they so choose.

WHEREFORE, Staff respectfully prays that the Commission will accept this Report and Recommendation as compliant with the Commission's orders.

Respectfully submitted,

/s/ Paul T. Graham

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 12th day of June, 2026.

/s/ Paul T. Graham