



Spire Inc.
605 Richard Arrington Jr Blvd N
Birmingham, AL 35203

March 14, 2025

Mr. Greg Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety
Administration

RE: CPF 3-2025-003-NOPV
Spire STL Pipeline, LLC – OPID 39886

Dear Mr. Ochs:

Spire has reviewed the six items from the referenced Notice of Probable Violation and Proposed Compliance Order letter sent on January 16, 2025 for the STL Pipeline facility. Spire does not contest the findings but has one detail clarification for Item #1 and additional information in the following responses.

Item #1 – External Corrosion Control Interference Currents

Spire STL Pipeline is developing a program for interference current monitoring and will submit it for review and approval within 30 days of the Final Order. One clarification that the Company needs to make concerning the NOPV is that AC current reads have been consistently collected and monitored since 2022 and, while not stored in Maximo, the Company has maintained those records in our PCS database. We believe this data was presented during the HQ inspection. Spire STL Pipeline can provide the previous AC readings for PHMSA's review if needed. At the foreign line crossings, Spire is planning for the installation of three new test stations in the upcoming weeks for assessing potential foreign line interference.

Item #3 – Emergency Plans:

Spire STL Pipeline added Spire Emergency Response Plan training to its operator qualification tracking system, Energy World Net, with an annual review requirement to confirm completion. Emergency plan refresher training was completed for all Spire STL Pipeline employees in 2023 and 2024 and is scheduled for 2025 accordingly.

Item #4 – Transmission Lines: Leakage Surveys

Beginning in 2025, Spire STL Pipeline will implement LiDAR leak detection surveys on the pipeline. In 2023 and 2024, Spire STL Pipeline used a combination of RMLD and walking leak surveys to complete surveys in the noted areas.

Item #5 – TIM subpart implementation

Spire STL Pipeline will be incorporating a process for documenting the selection and implementation of P&M Measures into its 2025 TIMP plan.

If you need additional detail, please feel free to contact me at (205) 337-1337.

Sincerely,

A handwritten signature in dark ink, appearing to read "Randy Wilson". The signature is fluid and cursive, with the first name "Randy" and last name "Wilson" clearly distinguishable.

Randy Wilson
Director, Pipeline and System Integrity

CC: Mr. Scott Smith
Mr. Mark Lowe
Ms. Nicole Christianer