



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

March 5, 2026

Mr. David Barrett
Acting Director, Central Region
Pipeline and Hazardous Materials Safety Administration

RE: CPF 3-2026-004-NOPV
GRIT Inspection - Spire STL, MoGas, Storage West

Dear Mr. Barrett:

Spire has reviewed the two items from the referenced inspection and Notice of Probable Violation and Proposed Compliance Order letter sent on February 3, 2026. Spire does not contest the findings but would like to submit additional comments.

The two findings were identified with the MoGas Pipeline system, which Spire purchased in January 2024. Spire has made several improvements with the MoGas system while incorporating it into operations. During that process, the system information has been converted from primarily paper system maps to GIS mapping. At the time of the inspection, Spire was working to use the GIS system maps to perform an updated class location/HCA/MCA analysis and had unexpected delays due to software issues and data availability. Spire is now working with an outside vendor to conduct the analysis, and completion will meet the compliance order timeline.

If you have any questions, please feel free to contact me at (205) 337-1337 or by email at Randy.Wilson@spireenergy.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Wilson", with a stylized flourish at the end.

Randy Wilson
Director, Pipeline and System Integrity

CC: Mr. Scott Smith
Mr. Trey Kuchar
Ms. Daniella Donaldson