

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

In the Matter of the Application of Spire Missouri, )  
Inc., for Permission and Approval and a Certificate )  
of Convenience and Necessity to Construct, Install, ) **File No. GA-2023-0441**  
Own, Operate, Maintain, and Otherwise Control )  
and Manage a Natural Gas Distribution System to )  
Provide Gas Service in Platte County, Missouri as )  
an Expansion of its Existing Certificated Areas )

**MOTION FOR EXTENSION OF TIME  
TO FILE STAFF RECOMMENDATION**

**COMES NOW**, the Staff of the Missouri Public Service Commission (“Staff”),  
by and through counsel, and for its *Motion for Extension of Time to File Staff  
Recommendation*, states as follows:

1. On June 28, 2023, Spire Missouri, Inc. (hereafter “Spire” or “the Company”) filed an application requesting a Certificate of Convenience and Necessity (CCN) to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide natural gas service in Platte County, Missouri as a further expansion of its existing certificated area, and request for waiver from the notice provisions of Commission Rule 20 CSR 4240.4.017(1).

2. On June 30, 2023, the Commission issued an *Order Directing Notice, Setting Deadline for Intervention Requests, and Directing Filing of Staff Recommendation*. In its *Order*, the Commission directed notice of the application and set a deadline for interested parties to intervene. The Commission received no intervention requests.

3. The Commission’s June 30, 2023 *Order* directed Staff to file its recommendation regarding the Company’s *Application* no later than August 14, 2023.

4. On August 7, 2023, Spire filed an *Amended Application for Certificate of Convenience and Necessity for Platte County and Request for Waiver* to correct the legal description that was set forth in its original June 28, 2023 filing.

5. Staff has and will continue to issue data requests to aid in its review, provide feedback, and continue discussions with Spire, and, as is common practice in cases regarding the expansion of existing natural gas distribution systems, Staff requests additional time to review the information provided thus far and determine if further information is needed.

6. In order to provide sufficient time to conduct further discovery, analyze newly acquired data and information from Spire, and complete its investigation, Staff requests an additional 45 days in which to complete and file its recommendation. That being said, Staff will endeavor to complete its review prior to any newly-established filing date.

7. Counsel for Spire and the Office of the Public Counsel have been contacted regarding this motion and neither party objects to the granting of an extension of time in this matter.

8. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

**WHEREFORE**, Staff respectfully submits this *Motion for Extension of Time to File Staff Recommendation* for the Commission's information and consideration and prays the Commission grant Staff an additional 45 days within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

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Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 11th day of August, 2023, to all counsel of record.

**/s/ Carolyn H. Kerr**