

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

In the Matter of Spire Missouri, Inc.)
d/b/a Spire (West) Purchased Gas) **Case No. GR-2021-0128**
Adjustment (PGA) Tariff Filing)

**STAFF RECOMMENDATION REGARDING SPIRE MISSOURI WEST’S
2019-2020 ACTUAL COST ADJUSTMENT FILING**

COMES NOW the Staff of the Missouri Public Service Commission in the above-captioned matter and files its Actual Cost Adjustment (“ACA”) Recommendation in this case concerning Spire Missouri Inc., d/b/a Spire’s (“Spire Missouri West”) 2019-2020 ACA filing as set forth in the accompanying Staff Recommendation Memorandum (Appendix A), and further states as follows:

1. Spire Missouri West filed its ACA for the 2019-2020 period in this case on November 2, 2020. This filing revises the ACA rates based upon Spire’s calculations of the ACA account balances for its Missouri West division.

2. The Commission’s Procurement Analysis Department Staff (“Staff”) has reviewed Spire Missouri West’s filing and submits its recommendation as further explained in the accompanying Staff Recommendation Memorandum, marked as Appendix A and incorporated herein by reference. Staff’s analysis consisted of a review of Spire Missouri West’s natural gas supply plans including a review of Spire Missouri West’s gas purchasing practices to evaluate the prudence of the purchasing decisions for this ACA period; a reliability analysis; and a hedging review. Staff’s analysis also included a review of Spire Missouri West’s billed revenues compared with its actual gas costs to determine whether there exists an over-recovery or under-recovery of the ACA balance. An over-recovery is shown as a negative ACA balance that must be returned to

customers; an under-recovery is shown as a positive ACA balance that must be collected from customers.

3. Based on its review, as discussed in further detail in the accompanying Staff Recommendation Memorandum (in “Public” and “Confidential” formats), Staff has proposed no dollar adjustments to Spire Missouri’ West’s ACA account balances filed on November 2, 2020. Staff recommends the Commission issue an order requiring Spire Missouri West to establish the ACA account balance to reflect the over-recovery balance as of September 30, 2020, as shown in the table in the “Recommendations” section of the Staff Recommendation Memorandum.

4. Although Staff has proposed no dollar adjustments, based on its review Staff has certain comments, concerns and recommendations as set forth in the Reliability Analysis and Gas Supply Planning section and the Hedging section of the accompanying Staff Recommendation Memorandum. Staff recommends the Commission order Spire Missouri West to respond to these concerns, comments, and recommendations within thirty (30) days.

WHEREFORE, for the reasons stated above and discussed in detail in the accompanying Staff Recommendation Memorandum, Staff recommends the Commission issue an order directing Spire Missouri West to respond within thirty (30) days to Staff’s concerns, comments, and recommendations discussed in the Reliability Analysis and Gas Supply Planning section and the Hedging section of Staff’s Recommendation Memorandum, and to establish the ACA account balances to reflect the over-recovery balance as of September 30, 2020, as shown in the table in the “Recommendations” section of the Staff Recommendation Memorandum.

Respectfully submitted,

/s/ Jamie S. Myers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 15th day of December, 2021.

/s/ Jamie S. Myers