

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

In the Matter of Spire Missouri, Inc. d/b/a            )  
Spire's Request for Authority to Implement        )  
a General Rate Increase for Natural Gas        )  
Service Provided in the Company's  
Missouri Service Areas

**Case No. GR-2022-0179**

**STAFF RESPONSE TO PROPOSED TEST YEAR**

**COMES NOW** Staff of the Missouri Public Service Commission (Staff) and submits the following response to the proposed test year by Spire Missouri, Inc. (Spire):

1. Staff recommends treating this case as an extended true-up process of the rate case from GR-2021-0108.

2. In its Exhibit 2, Schedule 3, Spire proposes “to use expense and rate base items based on the test year used in the 2021 Order (a test year ending September 20 [sic], 2020, adjusted for known and measurable rate base and expense items though May 31, 2021, while updating only certain material elements using a test year ending December 31, 2021, with a true-up period through September 30, 2022 (or sooner).”<sup>1</sup> The stated basis for Spire’s request is the short period of time since the issuance of the 2021 Order, and “to balance Spire Missouri’s needs to recover an appropriate revenue requirement on an expedited timeline.”<sup>2</sup> Spire also stated that its proposal “factors in the amount of resources it takes to process a rate case for the Company, Staff, OPC and other intervenors.”<sup>3</sup>

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<sup>1</sup> EFIS No. 2 at pdf page 12.  
<sup>2</sup> EFIS No. 2 at pdf page 12.  
<sup>3</sup> EFIS No. 2 at pdf page 12.

3. Staff appreciates the efforts to limit the resources it takes to process a rate case, and supports a test year used in the 2021 rate case ending September 30, 2020, adjusted for known and measurable rate base, as well as revenue and expense items through May 31, 2021 as ordered by the Commission in GR-2021-0108. Doing this updated test year reduced the number of issues in this case.

4. Staff also recommends a true-up through September 30, 2022.

5. By providing for a true-up period through September 30, 2022, there would no longer be a need for an update period.

6. In summary, Staff's recommendation is that the Commission adopt a test year ending September 30, 2020, adjusted for known and measureable rate base, revenue, and expense items through May 31, 2021 as ordered by the Commission in GR-2021-0108, with a true-up period through September 30, 2022.

**WHEREFORE**, Staff respectfully asks the Commission to adopt a test year ending September 30, 2020, adjusted for known and measureable rate base, revenue, and expense items through May 31, 2021, with a true-up period through September 30, 2022.

Respectfully submitted,

**/s/ Curt Stokes**

Curt Stokes

Chief Deputy Counsel

Mo. Bar No. 59836

P.O. Box 360

Jefferson City, MO 65102

(573) 751-4227 (Telephone)

(573) 751-9285 (Facsimile)

[Curtis.Stokes@psc.mo.gov](mailto:Curtis.Stokes@psc.mo.gov)

**Attorney for Staff of the 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 6<sup>th</sup> day of May, 2022, to all parties and/or counsels of records.

**/s/ Curt Stokes**