

**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) **Case No. GR-2022-0179**
Service Provided in the Company's)
Missouri Service Areas)

Staff's Response to Spire's Proposed Procedural Schedule

COMES NOW Staff of the Missouri Public Service Commission (Staff) and respectfully files the following response to the procedural schedule filed by Spire Missouri, Inc. (Spire):

1. On May 6, 2022, two competing proposed procedural schedules were filed in this case. Staff, along with the Office of the Public Counsel (OPC) and all intervenors that joined in a proposed procedural schedule, recommended a traditional eleven month procedural schedule. Spire Missouri, Inc. (Spire) proposed a significantly shorter procedural schedule. No party requested expedited transcripts, but given recent experiences with transcript delays—even in hearings as brief as four hours—Staff believes expedited transcripts should be ordered in this case under any scenario.

2. Spire's proposed procedural schedule alleges certain customer savings but makes those assertions without record evidence or any explanation of how those purported savings were calculated. Spire does not explain how those figures were calculated, or how to compare those purported savings to a situation where Spire had not filed this rate case at all, based on Spire's statement that it did "[a]bsolutely not" intend to file a rate case right after a lengthy and fully litigated case.¹

¹ Weitzel Direct at 6:13-15 (EFIS Item No. 4).

3. Spire also makes certain assertions about providing discovery responses, but many of Spire's responses provide data only through a time period limited through the beginning of 2022 (some are even through January only), and not through the periods requested by Staff in its Data Requests (DRs). In other words, Spire's DRs are not yet fully responsive and must be supplemented.

4. In Spire's previous rate case, GR-2021-0108, the Commission found that Spire was not in compliance with the Uniform System of Accounts (USOA) prescribed by the Commission. Based on Spire's own procedural schedule in this case, the overhead issue is a key driver of Spire's decision to file this rate case and request an expedited procedural schedule. Staff acknowledges the urgency with which Spire has requested new rates be ordered, but when a company fails to comply with the Commission-prescribed USOA all priorities should primarily be on remedying the violation, and only secondarily on addressing the consequences of the order finding the violation.

5. Finally, Spire's procedural schedule would result in significant strains on Staff resources, particularly with regard to Staff members assigned to the Evergy Missouri West (EMW) and Evergy Missouri Metro (EMM) rate cases and the ability to prepare for hearing in this case if it begins immediately after the conclusion of the hearings in the EMW and EMM rate cases. While Staff appreciates that the procedures in ER-2016-0023 did result in fewer issues, and Staff did discuss the benefits of that approach in late 2021/early 2022 with Spire, Staff did not agree to an expedited schedule in that conversation. The benefit of the limited issues in ER-2016-0023 were the limited number of issues, which resulted in a stipulation and agreement filed three

months prior to the operation of law date. Had the case not settled, though, the parties in ER-2016-0023 all agreed to a full eleven-month schedule.

WHEREFORE, Staff respectfully asks the Commission to accept this response to Spire's proposed procedural schedule, and if the Commission prefers to set oral argument or otherwise order the parties to provide answers the Commission may have about the differing proposals.

Respectfully submitted,

/s/ Curt Stokes

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**Counsel 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 11th day of May 2022, to all parties and/or counsels of records.

/s/ Curt Stokes

Curt Stokes