

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

In the Matter of Spire Missouri, Inc. d/b/a Spire)
(East) Purchased Gas Adjustment (PGA)) **File No. GR-2021-0127**
Tariff Filing)

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

**STAFF REPLY TO THE ENVIRONMENTAL DEFENSE FUND,
OFFICE OF THE PUBLIC COUNSEL, MIDWEST ENERGY CONSUMERS GROUP
AND CONSUMER COUNCIL OF MISSOURI**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Reply to the Environmental Defense Fund, Office of the Public Counsel, Midwest Energy Consumers Group and Consumer Council of Missouri* (Staff Reply) states as follows:

1. Staff has no objection to the intervention of the above named intervening parties to these proceedings.

2. As stated in previous Staff responses, Staff intends to initiate comprehensive discovery for the 2019-2020 ACA period in January. To start, Staff will issue 110 data requests each to Spire East and Spire West.

3. Staff suggests that the intervener parties and Office of the Public Counsel conduct discovery concurrently.

4. As ordered by the Commission, Staff will file its completed report and recommendations for the 2019-2020 ACA period no later than December 15, 2021.

5. Upon that filing, the parties will have had the benefit of extensive and concurrent discovery upon which to inform issues of interest and to base responsive filings to Staff's filed report. At that time the parties may identify issues in dispute for which a procedural schedule may be appropriate. This process ensures the opportunity

for parties' concerns to be heard with ample opportunity, if needed, for additional intervention, discovery, testimony, and hearing. Accordingly, Staff opposes ordering of any procedural schedule prior to the filing of Staff's recommendation in this case on December 15, 2021 as being premature.

6. Staff agrees with the parties that the company bears the burden of proof for its purchased gas charges.

7. Staff cannot emphasize enough the importance and necessity of having sufficient time to perform its extensive discovery and analyses of a multitude of complex gas supply decisions made by Spire during the 2019-2020 ACA period. Having the time needed to perform the detailed analyses of Spire's gas supply decisions works to the benefit of all parties.

8. No party is disadvantaged by this process. Purchased gas charges are made *interim subject to refund* until such time as litigation, if any, is concluded and the Commission orders the final ACA balances for the 2019-2020 period.

WHEREFORE, Staff prays the Commission accept its Reply.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 10th day of December 2020.

/s/ Robert S. Berlin