

**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) Tariff Filing ) File No. GR-2021-0127

**REQUEST FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission and for its *Request for Extension* to file the results of its ACA review and recommendations in this matter no later than April 29, 2022, states as follows:

**Background**

1. On October 30, 2020, Spire Missouri Inc, d/b/a Spire (“Spire East”) filed a proposed tariff sheet bearing an effective date of November 16, 2020. The tariff sheet was filed to reflect changes in Spire East’s Purchased Gas Adjustment (“PGA”) factors as the result of an estimated change in the cost of natural gas from the 2019-2020 winter season and changes in the Actual Cost Adjustment (“ACA”) factors. This case was established to reconcile the actual gas costs for the 2019-2020 ACA period.

2. Staff filed a recommendation on November 9, 2020, in which Staff recommended the Commission approve the PGA and ACA factor rate changes, on an interim basis, subject to refund, pending final Commission decisions in ACA Case Nos. GR-2021-0127 and GR-2020-0121, and to be effective no sooner than November 16, 2020. Staff further stated in its recommendation a request that the Commission grant Staff permission to submit its results and recommendations regarding the information included in that ACA filing to the Commission on or before December 15, 2021.

3. On November 16, 2020, the Commission issued an order approving the ACA rate changes, on an interim basis subject to refund, to become effective on and

after November 16, 2020. In that same order the Commission ordered Staff to file the results and recommendations of its ACA review no later than December 15, 2021.

### **Request for Extension**

4. As illustrated by the requests for early procedural schedules filed by various parties in this case, this ACA case contains unique and very complex issues not considered in previous ACA filings. Notably, this is the first ACA case where costs related to Spire East's contract with Spire STL Pipeline will be considered.

5. Several events have negatively impacted Staff's effort to effectively review the transactions in this ACA case. Budgetary constraints related to the COVID-19 pandemic has impacted the availability of Staff resources for much of the past year. The Cold Weather Event that occurred in February 2021 had a significant, unprecedented, impact on natural gas prices in the Midwest and unexpectedly caused Staff to direct a significant amount of resources to investigating the associated impacts<sup>1</sup> of the Cold Weather Event on an ongoing basis that will continue into the future. Further, the recent decision of the U.S. Appellate Court for the D.C. Circuit that vacated the certificate of convenience and necessity that had been issued to Spire STL Pipeline for operation of the pipeline resulted in Spire STL Pipeline filing a *Notice of Application for Temporary Emergency Certificate, Or, In the Alternative, Limited-Term Certificate* that asked the Federal Energy Regulatory Commission (FERC) for authority to continue operating the Spire STL Pipeline, and required additional Staff resources to investigate, report, and continue monitoring that situation.<sup>2</sup>

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<sup>1</sup> See Case Nos. AO-2021-0264, GO-2021-0362, GO-2021-0363, GO-2021-0364, GO-2021-0365, GO-2021-0366, GO-2021-0367.

<sup>2</sup> See Case No. GO-2022-0022.

6. With its remaining resources, Staff initiated its review several months ago in this case, and has submitted various data requests to gather additional information and has received responses. However, Staff believes in order to perform a thorough review, and provide the Commission with a supportable recommendation, Staff needs additional time to conduct follow up discovery, schedule meetings with appropriate Spire personnel, and draft and review its final recommendation. Staff requests the Commission issue an order that states the current ACA rates remains interim subject to refund, pending the Commission's final decision in this matter, and grants Staff's request to file the results of its ACA review and recommendations in this matter no later than April 29, 2022.

**WHEREFORE**, Staff requests the Commission issue an order that states the current ACA rates remain interim subject to refund, pending the Commission's final decision in this matter, and grants Staff's request to file the results of its ACA review and recommendations in this matter no later than April 29, 2022.

Respectfully submitted,

**/s/ Jamie S. Myers**

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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 on this 9<sup>th</sup> day of November 2021.

**/s/ Jamie S. Myers**