

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

In the Matter of Spire Missouri, Inc. d/b/a Spire)	<u>File No. GR-2021-0127</u>
(East) Purchased Gas Adjustment (PGA))	Tariff No. YG-2021-0110
Tariff Filing)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its Recommendation, states as follows:

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. This 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 for the winter season and changes in the Actual Cost Adjustment (“ACA”) factors.

2. In its *Amended Order Directing Expedited Staff Recommendation and Setting Time for Any Responses to Tariff Filing* (Order), issued November 2, 2020, the Commission directed Staff to file a recommendation regarding the tariff sheet filed by Spire East in Tariff No. YG-2021-0110 no later than November 9, 2020.

3. On November 4, 2020, Spire East filed a substitute tariff sheet in Tariff No. YG-2021-0110 which corrected a calculation error in various ACA factors.

4. The change in the PGA factor proposed in Spire East’s tariff sheet will decrease natural gas cost to \$0.37193/therm from \$0.41274/therm for Residential, Small General Service, Large General Service, Large Volume, and Other Firm Service customers. The Interruptible Sales customers’ PGA factor will decrease to \$0.27514/therm from \$0.27725/therm.

5. Due to the limited time available to review the documentation supporting the ACA factor in this filing, the Procurement Analysis Department has requested permission to submit the results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2021.

6. For the reasons explained in this Staff Recommendation and Staff Memorandum, attached hereto as Appendix A and incorporated herein, Staff recommends 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.

WHEREFORE, Staff respectfully requests that the Commission issue an order approving Spire East's tariff sheet as substituted November 4th in Tariff No. YG-2021-0110, on an interim basis, subject to refund, and to be effective no sooner than November 16, 2020. Accordingly, the Commission should approve:

PSC MO No. 7

3rd Revised Sheet 11.16, Cancelling 2nd Revised Sheet 11.16,
and direct Staff to submit the results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2021.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Missouri Bar No. 51709
Deputy Staff Counsel

Attorney for the Staff of the
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 9th day of November 2020.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GR-2021-0127, Tariff No. YG-2021-0110
Spire Missouri Inc., d/b/a Spire (East)

FROM: Michael J. Ensrud, Procurement Analysis Department

/s/ David M. Sommerer 11/09/2020
Financial and Business Analysis Div. /Date

/s/ Robert S. Berlin 11/09/2020
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Spire Missouri Inc., d/b/a Spire /
Scheduled Winter Season PGA Filing Effective November 16, 2020

DATE: November 9, 2020

On October 30, 2020, Spire Missouri Inc., d/b/a Spire (“Spire East” or “Company”) of St. Louis, Missouri, filed a tariff sheet with an effective date of November 16, 2020 for its Spire Missouri East division. The tariff sheet was filed to reflect scheduled changes in Spire East’s Purchased Gas Adjustment (PGA) factors as the result of an estimated change in the cost of natural gas for the winter season and changes in the Actual Cost Adjustment (ACA) factors.

On October 30, 2020, the Missouri Public Service Commission (“PSC” or “Commission”) issued an **ORDER DIRECTING EXPEDITED STAFF RECOMMENDATION AND SETTING TIME FOR ANY RESPONSES TO TARIFF FILING**, which directs Staff to file its recommendation by November 9, 2020.

On November 4, the Company filed a substitute tariff sheet, Tariff No. YG-2021-0110, which corrected a calculation error in various ACA factors.

Spire East states the following in its cover letter:

Spire East’s charges for gas will be reduced from \$.41274 to \$.37193 per therm; ...

These are the rate classes subject to the above PGA of \$.37193 per therm (a reduction of \$.04081 per therm): Residential General/Small General Service / Large General Service /Large Volume Service/ and Other Firm Service. The rate for Interruptible Service is \$.27514 per therm – a reduction of \$.00211 per therm – from the existing rate of \$.27725 per therm.

Case No. GR-2021-0127, under which these changes were filed, was established to track the Company’s PGA factors to be reviewed in its 2019-2020 ACA filing. Any rate change implemented pursuant to this tariff filing should be on an interim basis, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2021-0127 and GR-2020-0121.

OFFICIAL CASE FILE MEMORANDUM

MO PSC Case No. GR-2021-0127

Tariff No. YG-2021-0110

November 9, 2020

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Due to the limited time available to review the documentation supporting the ACA factor in this filing, the Procurement Analysis Department has requested permission to submit the results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2021. The ACA procedure involves review and true-up to the actual gas costs incurred.

Staff has verified that Spire East has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing, other than as mentioned above.

Staff has reviewed this filing and has determined it was calculated in conformance with Spire East's PGA Clause. Staff is of the opinion that good cause for approval of this tariff sheet on less than thirty (30) days' notice is demonstrated by Spire East's Commission-approved PGA clause allowing for ten (10) business days' notice for PGA change filings. Staff recommends the Commission issue an order approving the following tariff sheet, filed on October 30, 2020, as substituted on November 4th to become effective on November 16, 2020, on an interim basis, subject to refund pending final Commission decisions in Case Nos. GR-2021-0127, and GR-2020-0121.

PSC Mo No. 7

3rd Revised Sheet 11.16, Cancelling 2nd Revised Sheet 11.16

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

AFFIDAVIT OF MICHAEL J. ENSRUD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COME NOW MICHAEL J. ENSRUD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

/s/ Michael J. Ensrud
MICHAEL J. ENSRUD