

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

In the Matter of the Establishment of a Working)
Group and a Working Case for the Re-Writing of)
Spire, Inc.'s Cost Allocation Manual, including)
its Standards of Conduct, as necessary, for the)
Commission's Approval)

File No. GW-2018-

STAFF MOTION TO ESTABLISH WORKING GROUP AND WORKING CASE

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through Staff Counsel's Office, and moves the Commission to establish a working group and working case, pursuant to pages 59 and 60 of its March 7, 2018, *Amended Report and Order* in Consolidated File Nos. GR-2017-0215 and GR-2017-0216, to re-write Spire Missouri, Inc.'s¹ Cost Allocation Manual, as necessary, which is to be determined. In referring to the Company's CAM, the Staff believes the Commission was intending to include in the rewrite, a rewrite of the Gas Supply and Transportation Standards of Conduct ("SOC"), as necessary, which is to be determined. The SOC are a part of the CAM. It is difficult to think of an in-depth look at Spire's CAM not also looking at Spire's SOC. In support of its Motion, the Staff states as follows:

1. The Commission stated in its March 7, 2018, *Amended Report and Order* in File Nos. GR-2017-0215 and GR-2017-0216, at pages 59, 60 and 63:

The Commission finds that Spire Missouri's CAM should be rewritten, and the best way to accomplish that rewrite is to authorize a working group, comprised of Spire Missouri, Staff, Public Counsel, and any other interested stakeholders, to draft a proposed CAM for the Commission's approval.

¹ Spire Missouri Inc. (f/k/a Laclede Gas Company("Laclede")) and its operating units Spire Missouri East (f/k/a Laclede Gas Company) and Spire Missouri West (f/k/a Missouri Gas Energy ("MGE")), referred to herein as the "Company."

That working group will be established by the Commission in a separate order. [page 59] . . .

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. . . the technical details of the revised CAM should be addressed by the interested stakeholders through the working group that will be authorized. [page 60] . . .

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The Commission determines it is not necessary or appropriate to order Spire Missouri to hire an outside auditor to examine the company’s affiliate transactions and allocations. [page 63]

2. The Company at various times in the progress of the SOC gas supply investigation said it wanted to discuss with Staff and Public Counsel amending the SOC [page 10, Company October 16, 2017Response To Staff August 22, 2017 Report, File No. GO-2017-0223]:

Upon the conclusion of this investigation, the Company looks forward to working with the Staff to develop and propose revisions or additions to the SOC to better ensure that compliance with its goals is undertaken in a sensible, effective and efficient manner. . . .

3. Since the Commission in its *Amended Report and Order* in File Nos. GR-2017-0215 and GR-2017-0216, at page 59 refers to the working group being comprised of any interested stakeholder, Staff is serving this Motion on all parties to File Nos. GR-2017-0215 and/or GR-2017-0216, and requests that the Commission send a copy of its Order establishing a working group and a working case to all parties to File Nos. GR-2017-0215 and/or GR-2017-0216.

WHEREFORE, consistent with the Commission's March 7, 2018, *Amended Report and Order*, Staff moves that a working group and a working case be established, where Spire Missouri, Staff, the Office of the Public Counsel, and any other interested stakeholders can work together to re-write Spire Missouri, Inc.'s Cost Allocation Manual, including its Standards of Conduct, as necessary, which is to be determined, for the Commission's approval.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 6th day of June, 2018 in File Nos. GR-2017-0215 and/or GR-2017-0216.

/s/ Steven Dottheim