

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

In the Matter of Spire Missouri, Inc.	)	
d/b/a Spire's Request to Decrease	)	Case No. GO-2019-0058
WNAR	)	

In the Matter of Spire Missouri, Inc.'s	)	
d/b/a Spire's Request to Increase Its	)	Case No. GO-2019-059
WNAR	)	

**THE MISSOURI OFFICE OF THE PUBLIC COUNSEL’S  
STATEMENT OF POSITION ON THE ISSUES**

**COMES NOW** the Office of the Missouri Public Counsel (OPC or Public Counsel) and for its Statement of Position on the Issues, and in support thereof states as follows:

1. The parties to this joint proceeding are Spire Missouri Inc. (“Spire”) on behalf of both its Spire Missouri East and Spire Missouri West operating units, Staff of the Missouri Public Service Commission (“Staff”), and the Office of the Public Counsel (“OPC”).

2. Pursuant to the Commission’s October 19 Order, the parties were to agree upon and Staff was to file “a list of the issues to be heard, the witnesses to appear on each day of the hearing, the order in which they will be called, and the order of cross examination for each witness.” Staff reached out to the parties to this case and now files this pleading in satisfaction of that directive. Public Counsel agrees with the List of Issues submitted by the Staff.

### Statement of Position on the Issues

(1) Does the Weather Normalization Adjustment Rider (“WNAR”) tariff language of Spire Missouri East and Spire Missouri West [i.e., P.S.C. MO. No. 7, Sheet No. 13 and P.S.C. MO. No. 8, Sheet No. 13] which was ordered in the Commission’s Amended Report and Order in Case Nos. GR-2017-0215 and GR2017-0216 mean (a) that daily normal weather ranked on current accumulation period actual daily temperature data and compared to current accumulation period actual daily weather should be used for purposes of calculating the WNAR adjustments or (b) that daily normal weather ranked on 2016 actual daily temperature data and compared to current accumulation period [2018 in this case] actual daily weather should be used for purposes of calculating the WNAR adjustments?

(2) If the Commission determines that the weather normalization adjustment rider (“WNAR”) tariff sheets of Spire Missouri East and/or Spire Missouri West [i.e., P.S.C. MO. No. 7, Sheet No. 13 and P.S.C. MO. No. 8, Sheet No. 13, respectively] are vague regarding how the WNAR rate adjustments are to be calculated, is Staff’s or Spire’s interpretation of the tariff and calculation method most consistent with the Commission’s intent when it ordered adoption of the WNAR tariff?

**Response:** While either interpretation is possible, it is Public Counsel’s position that the Commission should adopt the methodology that results in the most accurate calculation. Staff’s well researched and long-established methodology of assigning the daily normal Heating Degree Days (HDD) calculated in the last case to the actual daily weather in the time period to be should be used for each period. Natural gas usage is 95% correlated with weather and specifically Heating Degree Days (HDD) and any ambiguity should be resolved in favor of setting the most accurate and reasonable rate. In ordering implementation of the WNAR, the Commission noted: using

Staff's climatic normal and weather normalization in the form of the WNAR tariff would more accurately resolve the revenue stabilization issue because it is specifically linked to daily weather fluctuations.<sup>1</sup> "It is clear from the Commission's order that the intent of the WNAR is to accurately resolve revenue fluctuations due to weather."<sup>2</sup> Public Counsel supports Staff's methodology because it is the most accurate and, therefore, likely to be the most just and reasonable for both the Companies and their customers.

**WHEREFORE**, the Office of the Public Counsel submits its Statement of Position on the Issues.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

BY: /s/ Lera L. Shemwell

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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 counsel of record this 11<sup>th</sup> day of January, 2019.

/s/ Lera Shemwell

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<sup>1</sup> Page 84.

<sup>2</sup> Mantle Direct p. 2.