

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

In the Matter of Spire Missouri Inc.'s) d/b/a Spire's Request to Decrease its WNAR)	<u>File No. GO-2019-0058</u> Tracking No. YG-2019-0039
In the Matter of Spire Missouri Inc.'s) d/b/a Spire's Request to Increase its WNAR)	<u>File No. GO-2019-0059</u> Tracking No. YG-2019-0040
In the Matter of Spire Missouri Inc.'s) d/b/a Spire's Request to Decrease WNAR)	<u>File No. GO-2019-0255</u> Tracking No. JG-2019-0164 Tracking No. JG-2019-0165

**STAFF RECOMMENDATION, MOTION TO CONSOLIDATE,
AND NONOPPOSITION TO MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and respectfully states as follows:

1. On March 29, 2019 Spire Missouri Inc. d/b/a Spire ("Spire") filed a *Motion for Expedited Treatment and Approval of Tariff on Less than 30 Days' Notice* and substitute tariff sheets revising its weather normalization adjustment riders ("WNARs") for Spire East and Spire West in File Nos. GO-2019-0058, GO-2019-0059, and GO-2019-0255 with proposed effective dates of October 1, 2018 and April 1, 2019. Spire stated that good cause exists for expedited treatment, because the proposed WNARs would reduce the rates of Spire East and Spire West residential customers.

2. On April 1, 2019 the Commission ordered Staff to respond to Spire's motion by noon on April 2, 2019. Also on April 1, 2019, Spire filed two substitute tariff sheets in File No. GO-2019-0255¹ and substitute tariff sheets in both File Nos. GO-2019-0058 and GO-2019-0059. The substitute tariff sheets in File Nos. GO-2019-0058 and GO-2019-0059 are identical to the substitute tariff sheets in GO-2019-0255, because

¹ JG-2019-0164 and JG-2019-0165

both of the proposed WNAR rates are located on a single tariff sheet for Spire East and another tariff sheet for Spire West. .

3. Accompanying this pleading, and incorporated by reference, is Staff's Memorandum recommending Commission approval of the rates Spire filed on its substitute tariff sheets filed April 1, 2019 in File No GO-2019-0255. Staff suggests that that the Commission reject the tariff sheets Spire filed in File Nos. GO-2019-0058 and GO-2019-0059, because these tariff sheets are duplicative of the sheets Spire filed the same day in Tariff Tracking Nos. JG-2019-0164 and JG-2019-0165.

4. Because Spire filed both periods' WNARs on a single tariff sheet for each Spire East and Spire West, consolidation of the files is appropriate. Commission Rule 4 CSR 240-2.110(3) provides for consolidation when pending actions involve related questions of law or fact. The three subject files involve the same questions of law and closely related questions of fact. For this reason, Staff moves for consolidation of the files.

5. Staff does not oppose Spire's motion for expedited treatment. Good cause exists to treat this matter with expedited treatment, because Spire's proposed rates will lower its residential customers' bills.

WHEREFORE, Staff submits this Staff Recommendation recommending the Commission issue an order (1) consolidating File Nos. GO-2019-0058, GO-2019-0059, and GO-2019-0255, (2) rejecting the tariff sheets Spire filed April 1, 2019 in Tariff Tracking Nos. YG-2019-0039 and YG-2019-0040, and (3) approving the tariff sheets Spire filed April 1, 2019 in Tariff Tracking Nos. JG-2019-0164 and JG-2019-0165.

Respectfully submitted,

/s/ Karen E. Bretz

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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 2nd day of April, 2019.

/s/ Karen E. Bretz

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. GO-2019-0255, Tariff Tracking Nos. JG-2019-0164 and JG-2019-0165
File No. GO-2019-0058, Tariff Tracking No. YG-2019-0174
File No. GO-2019-0059, Tariff Tracking No. YG-2019-0173
Spire Missouri, Inc.

FROM: Michael Stahlman, Regulatory Economist III
/s/ Robin Kliethermes 4/2/2019 /s/ Karen Bretz 4/2/2019
Tariff / Rate Design Manager / Date Staff Counsel Division / Date

SUBJECT: Staff Recommendation for the **Approval** of the Tariff Sheets Filed by Spire to adjust its Weather Normalization Adjustment Rider to go into effect on April 5, 2019, the requested expedited approval date, or as soon thereafter as reasonably practicable.

DATE: April 2, 2019

Background

File Nos. GO-2019-0058 and GO-2019-0059

On August 31, 2018, Spire Missouri, Inc. (“Spire” or the “Company”) filed with the Missouri Public Service Commission (“Commission”) one tariff sheet in Tariff Tracking No. YG-2019-0039 and another tariff sheet in Tariff Tracking No. YG-2019-0040 to adjust the Weather Normalization Adjustment Rider (“WNAR”) in each of its two operating divisions, Spire Missouri East and Spire Missouri West. Each tariff sheet bore a proposed effective date of October 1, 2018. On September 14, 2018, the Staff of the Commission (“Staff”) filed its Recommendations to reject the proposed tariff sheets and order Spire to file P.S.C. MO. No. 7 Tariff Sheet No. 13.2 with a WNAR rate of \$(0.00050) and P.S.C. MO. No. 8 Tariff Sheet No. 13.2 with a WNAR rate of \$0.00084. On September 20, 2018, the Commission suspended Spire’s first set of WNAR tariff sheets until April 1, 2019.

File No. GO-2019-0255

On March 1, 2019, Spire filed revised tariff sheets, P.S.C. MO. No. 7 Second Revised Sheet No. 13.2 Cancelling P.S.C. MO. No. 7 First Revised Sheet No. 13.2 (JG-2019-0164 Spire East) and P.S.C. MO. No. 8 Second Revised Sheet No. 13.2 Cancelling P.S.C. MO. No. 8 First Revised Sheet No. 13.2 (JG-2019-0165 Spire West) in regards to the Company’s April 1, 2019 WNAR rate adjustment. On March 6, 2019, Staff filed a Motion to Suspend Tariff Sheets. On March 20, 2019, the Commission suspended Spire’s second set of WNAR tariff sheets until October 1, 2019 and ordered the Staff to file a recommendation for the second set of WNAR tariff sheets no later than March 30, 2019.

Report and Order in File Nos. GO-2019-0058 and GO-2019-0059 and thereafter

On the same date that the Commission suspended Spire’s second set of WNAR tariff sheets, March 20, 2019, the Commission issued its Report and Order on Spire’s first set of WNAR tariff sheets in File Nos. GO-2019-0058 and GO-2019-0059. In its order, the Commission rejected Spire’s first set of WNAR tariff sheets and ordered Spire to file tariff sheets consistent with its order.

On March 29, 2019, the Staff filed a Recommendation in File No. GO-2019-0255 that recommended the Commission continue its suspension of the second set of WNAR tariff sheets until Spire files substitute tariff sheets that are consistent with the Commission’s Report and Order issued on March 20, 2019 in File Nos. GO-2019-0058 and GO-2019-0059. Later that day, Spire filed two substitute tariff sheets in File No. GO-2019-0255, and substitute tariff sheets in File Nos. GO-2019-0058 and GO-2019-0059. The substitute tariff sheets in File Nos. GO-2019-0058 and GO-2019-0059 are identical to the substitute tariff sheets in GO-2019-0255 because both of the proposed WNAR rates are located on a single tariff sheet for Spire East and another tariff sheet for Spire West. On April 1, 2019, the Commission ordered Staff to file a recommendation in response to Spire Missouri Inc.’s Motion for Expedited Treatment and Approval of Tariff on Less than 30 Days’ Notice no later than noon on April 2, 2019 in all three file numbers (File Nos. GO-2019-0058, GO-2019-0059, and GO-2019-0255). On April 1, 2019, Spire filed substitute tariff sheets in File Nos. GO-2019-0058, GO-2019-0059, and GO-2019-0255.

This Filing

Spire’s WNAR became effective on April 19, 2018. The purpose of the tariff is to adjust revenues for differences between actual heating degree days (AHDD) and normal heating degree days (NHDD) of the residential class. These tariff sheets reflect a combination of Spire’s first and second WNAR filings. Spire’s current and proposed rates are included in Table 1 below.

Table 1: Current and Proposed WNAR Rates by District.

District	Current	Proposed
Spire East	0.00000	-0.00941
Spire West	0.00000	-0.00566

Because the previous periods generally experienced colder weather than normal in Spire’s rate districts, the proposed rates for all classes are negative in this filing. This means a residential customer that used 100 ccf in a given billing month would see an approximate \$0.94 reduction in their bill if located in the Spire East districts, and an approximate \$0.57 reduction if located in the Spire West district.

Staff Recommendation

Staff has reviewed the following tariff sheets, as substituted on April 1, 2019, and recommends approval of the following tariff sheets to go into effect for service on and after April 5, 2019, the requested expedited approval date, or as soon thereafter as reasonably practicable:

P.S.C. MO. No. 7

First Revised Sheet No. 13.2 Cancelling Original Sheet No. 13.2

P.S.C. MO. No. 8

First Revised Sheet No. 13.2 Cancelling Original Sheet No. 13.2

Staff has verified that Spire is not delinquent on any assessment and has filed its Annual Report. Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.

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

In the Matter of Spire Missouri Inc.'s Filing of)	<u>File No. GO-2019-0255</u>
Its Proposed Weather Normalization)	Tracking No. JG-2019-0164
Adjustment Rider (WNAR) Tariff Sheets)	Tracking No. JG-2019-0165
In the Matter of Spire, Missouri Inc., d/b/a)	<u>File No. GO-2019-0058</u>
Spire's Request to Decrease WNAR)	Tracking No. YG-2019-0174
In the Matter of Spire, Missouri, Inc. d/b/a)	<u>File No. GO-2019-0059</u>
Spire's Request to Increase its WNAR)	Tracking No. YG-2019-0173

AFFIDAVIT OF MICHAEL L. STAHLMAN

State of Missouri)
) ss.
County of Cole)

COMES NOW Michael L. Stahlman, 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.

Further the Affiant sayeth not.

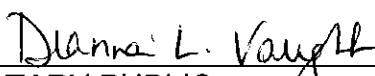


Michael L. Stahlman

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 1st day of April, 2019.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377



NOTARY PUBLIC