BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Spire Missouri Inc. d/b/a Spire for Approval to Establish an On-Bill Financing Program and Cost Recovery Mechanism

Case No. GO-2021-0126 Tracking Nos. YG-2021-0110; YG-2021-0112; YG-2021-0113

STAFF MOTION TO EXTEND

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Extend* in this matter hereby states:

1. Spire Missouri, Inc. d/b/a Spire filed its Verified Application of Spire Missouri Inc. for Approval to Establish an On-Bill Financing Program and Cost Recovery Mechanism for its Missouri Service Territory and Request for Waiver from its 60 Day Notice Rule along with direct testimony and revised tariff sheets on October 30, 2020. The Application seeks approval of a new tariffed program, an on-bill financing program and an associated cost recovery mechanism. The Commission ordered Staff to review the Application and provide a recommendation no later than November 13, 2020.

2. Staff began its investigation including a full review of the *Application*, testimony and tariffs, along with discovery. Staff's technical findings thus far have revealed several concerns and questions, which Staff was unable to resolve by the ordered filing date. To that end, Staff would request an additional 31 days in which to continue its investigation and provide a recommendation.

WHEREFORE, Staff prays that the Commission will accept this *Motion for Extension*; permit it until December 14, 2020, to file a Staff recommendation; and that it grant such other and further relief as the Commission considers just in the circumstances.

1

<u>/s/ Whitney Payne</u>

Whitney Payne Senior Counsel Missouri Bar No. 64078 Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-8706 (Telephone) (573) 751-9285 (Fax) whitney.payne@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 13th day of November, 2020, to all counsel of record.

<u>/s/ Whitney Payne</u>