

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

In the Matter of Application of Spire)	
Missouri, Inc. d/b/a Spire to Change its)	<u>Case No. GO-2023-0203</u>
Infrastructure System Replacement)	Tracking No. JG-2023-0115
Surcharge in its Spire Missouri East and)	
West Service Territories)	

MOTION TO SUSPEND TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Suspend Tariff Sheets* respectfully states as follows:

1. On December 27, 2022, Spire Missouri Inc. (“Spire Missouri”), filed an application and petition with the Commission pursuant to Sections 393.1009, 393.1012, and 393.1015, RSMo, and Commission Rules 20 CSR 4240-2.060, 2.080, and 3.265, requesting that the Commission authorize changes to the Spire Missouri East and Spire Missouri West Infrastructure System Replacement Surcharges (ISRS). Spire Missouri also included a tariff sheet, Tracking No. JG-2023-0115, setting out the rates it intends to become effective.

2. The tariff sheet, Tracking No. JG-2023-0115, is applicable to both Spire Missouri East and Spire Missouri West, and bears an effective date of January 26, 2023. Pursuant to Section 393.150.1, RSMo, the Commission may suspend the effective date of a proposed tariff sheet for 120 days or for a period not to exceed six months. On December 28, 2022, the Commission suspended the tariff sheet until June 25, 2023.

3. On December 28, 2022, the Commission issued an Order directing anyone wanting to intervene in the matter do so by January 26, 2023, and Ordered Staff to file its recommendation by March 27, 2023.

4. On January 6, 2023, Missouri Industrial Energy Consumers (“MIEC”) filed its Application to Intervene in the matter.

5. Then on January 10, 2023, Spire Missouri filed a Substitute Tariff with an effective date of January 27, 2023, which was incorrect per Spire Missouri and resulted in a new Substitute Tariff along with a letter of explanation being filed on January 11, 2023. The Substitute Tariff is Spire Missouri’s Fourth Revised Tariff Sheet P.S.C. No. 9 Sheet No. 12 cancelling its Third Revised Tariff Sheet P.S.C. No. 9 Sheet No. 12 and is applicable to both Spire Missouri East and West operating units. This revised tariff sheet has an issue date of December 27, 2022 and an effective date of January 26, 2023.

6. Staff has begun its review of Spire’s tariff filing and intends to file its recommendation on or before the deadline set out in the Commission’s Order.

7. Due to the fact Spire Missouri filed a Substitute Tariff, with an effective date of January 26, 2023, after the Commission’s Order suspending the original tariff filed with Spire Missouri’s ISRS Application, the Substitute Tariff may go into effect if an Order is not issued suspending said Substitute Tariff.

8. Staff moves the Commission to suspend the effective date of the newly proposed Substitute Tariff listed above pursuant to Section 393.150.1, RSMo, and 20 CSR 4240-2.065 until June 25, 2023 as it did in its original order.

WHEREFORE Staff respectfully requests that the Commission issue an order with an effective date of no later than January 25, 2023, suspending Spire Missouri’s Substitute Tariff Fourth Revised Tariff Sheet P.S.C. No. 9 Sheet No. 12 cancelling its Third Revised Tariff Sheet P.S.C. No. 9 Sheet No. 12, and grant such other and further relief as the Commission finds appropriate under the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 25th day of January, 2023.

/s/ J. Scott Stacey