

**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 a Temporary Variance of its)
Meter Sampling Program for Diaphragm Meters) **File No. GE-2023-0354**
During Deployment of Ultrasonic Automated)
Metering Infrastructure)

STAFF'S RECOMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Recommendation*, states the following:

1. On April 11, 2023, Spire Missouri, Inc. (“Spire” or “Company”) filed an application requesting that the Commission approve a variance from the Company's meter sampling program. The Commission authorized Spire's meter sampling program to comply with 20 CSR 4240-10.030(19) requirements for diaphragm meters during the deployment of ultrasonic automated metering infrastructure. Spire also requested waiver of the Commission's rule requiring sixty days' notice prior to filing an application.

2. On May 11, 2023, Staff filed its *Status Report*. Staff requested until July 10, 2023, to file its recommendation. The request was granted, and the Commission ordered Staff to file its recommendation no later than July 10, 2023.

3. Attached hereto and incorporated herein is *Staff's Recommendation*, in which Staff recommends that the Commission grant Spire's request for a temporary variance from meter testing until December 31, 2025, for its Spire Missouri East operating area, subject to conditions. Additionally, Staff recommends that the Commission deny Spire's request for a variance from the Commission's order in GO-91-253 for its Spire Missouri West operating area.

4. Staff is not opposed to the Commission granting Spire's requested waiver from the requirements of Commission Rule 20 CSR 4240-4.017(1).

WHEREFORE, Staff respectfully requests the Commission to approve Spire's request for a temporary variance from meter testing until December 31, 2025, for its Spire Missouri East operating area, subject to conditions. Staff respectfully requests the Commission to deny Spire's request for a variance from the Commission's order in GO-91-253 for its Spire Missouri West operating area.

Respectfully submitted,

/s/ Eric Vandergriff

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Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 10th day of July, 2023.

/s/ Eric Vandergriff