

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

In the Matter of Spire Missouri Inc.'s d/b/a            )  
Spire Verified Application for Approval of            )     **Case No.: GF-2022-0169**  
Financing Authority                                            )

**STAFF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and submits the attached Staff Recommendation (which is incorporated herein by reference) as directed by the Commission's Order Directing Staff to File Recommendation issued on December 23, 2021, and in support thereof states as follows:

1. On December 22, 2021, Spire Missouri Inc. ("Spire Missouri" or "Company") filed a Verified Application for Approval of Financing Authority requesting financing authorization in the amount of approximately \$800 million through 2024 ("Application"). Spire Missouri filed the application pursuant to Sections 393.180, 393.190 and 393.200 RSMo and Commission Rules 20 CSR 4240-2.060 and 10.125.

2. Spire Missouri also requests a waiver of the 60-day notice requirement of Commission Rule 20 CSR 4240-4.017(1). The Company contends that Rule 20 CSR 4240-4.017(1)(D) allows an organization to request a waiver for good cause. "Good cause for waiver may include, among other things, a verified declaration from the filing party that it has had no communications with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. . . ." To this end, Spire Missouri included with its application a Verification and Affidavit that no one from the Company had had communication with the Commission in the last 150 days regarding any substantive issues concerning this case.

3. On December 23, 2021, the Commission issued its order directing the Staff file its recommendation regarding the application by January 24, 2022, and on January 20, 2022, the Commission extended that deadline to January 31, 2022.

4. Staff has reviewed the application and data obtained from the Company and submits the attached Staff Recommendation based on its review.

5. For the reasons stated in the attached Staff Recommendation, Staff recommends the Commission issue an order granting Spire Missouri financing authorization of \$800 million, as requested, subject to the eleven conditions set out in the Staff Recommendation.

**WHEREFORE**, Staff respectfully requests the Commission grant Spire Missouri's waiver and recommends approval of Spire Missouri's Application subject to the eleven conditions specifically enumerated in the attached Staff Recommendation and that this matter be placed on the Commission's agenda as soon as possible.

Respectfully submitted,

/s/ Paul T. Graham

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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 31<sup>st</sup> day of January, 2022.

/s/ Paul T. Graham