

**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)
Financing Authority) **Case No.: GF-2022-0169**

**STAFF'S REQUEST THAT THE COMMISSION SUSPEND
THE DEADLINE FOR STAFF'S REPLY**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and requests the Commission suspend the deadline for Staff's replies to responses to its recommendation on Spire's application for approval of financing authority:

1. On January 31, 2022,¹ Staff filed its recommendation ("January 31 Recommendation") concerning the Verified Application for Approval of Financing Authority ("Application") filed by Spire Missouri Inc. ("Spire Missouri") on December 22, 2021.

2. Staff recommended that the Commission grant Spire Missouri financing authority as requested in the application, subject to the eleven conditions specifically set out in the Memorandum attached to the Staff recommendation.

3. On February 10, Spire Missouri filed its response to Staff's recommendation and asked the Commission to approve the application as recommended by the Staff. On February 10, the Office of Public Counsel ("OPC") filed its response to Staff's recommendation. OPC recommended that the Commission make three changes to the Staff's recommended conditions, all as set specifically set out in OPC's response.

¹ All date references will be to 2022 unless otherwise indicated.

4. On February 14, the Commission issued its Order Directing Responses to Conditions Proposed by OPC. The Commission ordered Spire Missouri to file a response to OPC's recommendations no later than February 17 and set that same date as the deadline for any other replies to OPC's deadline.

5. Staff reports that it has reviewed OPC's filed recommendations and that all parties (Spire Missouri, OPC and Staff) have engaged in discussions concerning OPC's recommendations. Because those discussions are ongoing and because Spire Missouri and OPC's respective current positions may no longer be reflected in what they have previously filed with the Commission, any pleading from Staff is now premature. Accordingly, the Commission should suspend the deadline for Staff to file any replies until further order of the Commission.

WHEREFORE, Staff respectfully requests that the Commission suspend the deadline for the Staff to file any replies to any pleading filed in response to Staff's January 31 Recommendation; and for such other and further relief as is deemed necessary.

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 17th day of February, 2022.

/s/ Paul T. Graham