

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

In the Matter of Spire Missouri, Inc.'s) **Case No. GO-2019-0059**
Spire West, Request to Increase its WNAR) Tracking No. YG-2019-0040

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and respectfully states as follows:

1. On August 31, 2018, Spire Missouri Inc. d/b/a Spire (“Spire”) filed a tariff sheet (Tariff File No. YG-2019-0040, with a proposed effective date of October 1, 2018) to adjust Spire Missouri West’s weather normalization adjustment rider (“WNAR”) rate to \$0.00114.¹

2. On September 4, 2018, the Commission issued an *Order Setting Date for Filing Response* (“Order”) which directed Staff to file its recommendation regarding Tariff File No. YG-2019-0040 no later than September 14, 2018.

3. Accompanying this pleading and incorporated by reference is Staff’s Recommendation Memorandum which recommends that the Commission reject the tariff sheets filed by Spire in Tariff File No. YG-2019-0040, because Spire did not properly calculate the WNAR rate. Based on the errors addressed in the Recommendation Memorandum, Staff has determined that the WNAR rate for Spire Missouri West should be \$0.00084 instead of the rate as requested by Spire.

¹ On September 14, 2018, -- *the day that Staff’s recommendation was due* in this case pursuant to the Commission’s order – Spire filed a substitute tariff in Tariff File No. YG-2019-0040; however, the substitute tariff did not correct all of the errors identified in Staff’s recommendation. Therefore, all of the tariffs filed by Spire in this file should be rejected.

WHEREFORE, Staff submits the accompanying Recommendation Memorandum as directed by the Commission's Order issued September 4, 2018, recommending the Commission issue an order (1) rejecting the tariff sheets filed by Spire contained in Tariff File No. YG-2019-0040 and (2) ordering Spire to file P.S.C. MO. No. 8, Tariff Sheet No. 13.2 with a WNAR rate of \$0.00084 for Spire Missouri West.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 14th day of September, 2018.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. GO-2019-0059, Tariff File No. YG-2019-0040
In the Matter of Spire Missouri, Inc.'s, Spire West, Request to Increase Its WNAR

FROM: Robin Kliethermes, Rate and Tariff Examination Manager

/s/ Robin Kliethermes 9/14/2018 /s/ Jeff Keevil 9/14/18
Tariff/Rate Design Department/Date Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for the **Rejection** of the Tariff Sheets Filed by Spire Missouri Inc., Spire West ("Spire West") to adjust its Weather Normalization Adjustment Rider

DATE: September 14, 2018

On August 31, 2018, in File No. GO-2019-0059, Spire West filed one tariff revision with Tracking No. YG-2019-0040 to adjust Spire West's weather normalization adjustment rider (WNAR) rate to \$0.00114.

BACKGROUND

Spire Missouri West's weather normalization adjustment rider became effective on April 19, 2018. The purpose of the tariff is to adjust revenues for differences between actual heating degree days (AHDD) and normal heating degree days (NHDD).

STAFF FINDINGS

Staff has reviewed Spire West's workpapers and found that Spire West did not account for the appropriate number of AHDDs and NHDDs occurring between meter read dates per each bill cycle. For example, a customer's meter may be read on April 19th in order to calculate a customer's April bill. Using this example, a customer's bill will include usage ending April 18th. If the bill cycle is 30 days, this customer's April bill would include usage that occurred from March 20th through April 18th. However, when Spire West counted the number of AHDDs and

NHDDs for this bill cycle Spire West included the AHDDs and NHDDs that occurred on April 19th as part of the sum of AHDDs and NHDDs that occurred during the March 20th through April 18th bill cycle. Since the effective date of the WNAR tariff is April 19th, this inaccurate calculation led to a mismatch between the days of the month included in a specific bill cycle and sum of the AHDDs and NHDDs that occurred during the bill cycle. Spire West indicated that substitute tariffs will be filed to reflect the correction.

Further, Staff determined that Spire West did not appropriately allocate a given month's NHDD among that month's days as provided in the tariff. Staff's NHDD per day as determined in the last rate case were apportioned to the days of each month by aligning the highest level of NHDD to occur in that month with the day that had the highest level of AHDD that occurred in that month. Using this method maintains a consistent comparison between the coldest normal day to occur in that month with the coldest day that actually occurs in the month, while still maintaining the same total number of NHDD determined in the most recent rate case.

Based on the errors mentioned above, Staff has determined that the WNAR rate for Spire West should be \$0.00084 instead of \$0.00114 as requested by Spire West. Staff's calculated rate would result in a bill increase of \$0.084 for a customer using 100 ccf a month.

RECOMMENDATION

At this time, Staff recommends the Commission enter an order (1) rejecting the tariff sheets contained in Tracking No. YG-2019-0040; and (2) order Spire West to file Tariff Sheet No. 13.2 with a WNAR rate of \$0.00084.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Spire Missouri, Inc.'s,)
Spire West, Request to Increase Its WNAR) File No. GO-2019-0059

AFFIDAVIT OF ROBIN KLIETHERMES

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW ROBIN KLIETHERMES and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Staff Recommendation in Memorandum form; and that the same is true and correct according to her best knowledge and belief.

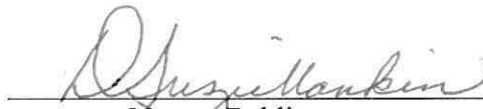
Further the Affiant sayeth not.


ROBIN KLIETHERMES

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14th day of September, 2018.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: December 12, 2020
Commission Number: 12412070


Notary Public