# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc. d/b/a Spire's Request to Decrease Its WNAR	)	Case No. GO-2019-0058
In the Matter of Spire Missouri Inc. d/b/a Spire's Request to Increase Its WNAR	)	Case No. GO-2019-0059

### REQUEST FOR COMMISSION TO RECEIVE LATE-FILED EXHIBIT

**COMES NOW** Staff of the Missouri Public Service Commission and for this Request for Commission to Receive Late-Filed Exhibit ("Request") respectfully states as follows:

- 1. A joint evidentiary hearing was held in these cases on January 15, 2019. At the hearing there appeared to be interest from the Commission in seeing a calculation of the difference between Staff's method and Spire's method based on actual historical data.
- At the conclusion of the hearing, before going off the record, counsel for Spire indicated that the parties might submit a late-filed exhibit for the Commission's consideration.
- 3. Submitted herewith is a late-filed exhibit which shows the difference for Spire Missouri *East* between Staff's method and Spire's method, based on 12 calendar months' of actual historical data. It should be noted that this is not the calculation of the WNAR adjustment recommended in this case (which is based on a shorter period of time representing the accumulation period); instead, the attached shows the difference over a 12 calendar month period of data. As shown in the column on the right side of the first page of the attached, for Spire Missouri East the difference

between methods would have amounted to only \$80,295 over this 12 calendar month period.

4. Staff would request that the attached be received by the Commission into the evidentiary record of these proceedings and assigned Staff's next exhibit number, which the undersigned believes to be Exhibit number 210.

WHEREFORE Staff respectfully requests the Commission receive the attached as a late-filed exhibit and assign it Staff's next exhibit number.

Respectfully submitted,

### **Isl Mark Johnson**

Mark Johnson
Deputy Staff Counsel
Missouri Bar Number 64940
Attorney for Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-7431 (Voice)
573-526-6969 (Fax)
mark.johnson@psc.mo.gov

## **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 on this 23<sup>rd</sup> day of January, 2019.

#### **Isl Mark Johnson**