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

In the Matter of the Application of Missouri	)
Spire, Inc. d/b/a Spire for Approval to	)
Establish an On-Bill Financing Program	) Case No. GO-2021-0126
and Cost Recovery Mechanism	)

## RESPONSE OF THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri ("Consumers Council" or "CCM"), and hereby files its Response to the Public Service Commission Staff ("Staff") Recommendation and Memorandum ("Recommendation") submitted on February 26, 2021. The Staff Recommendation raises serious issues and recommends rejection of proposed the tariff sheets. Consumers Council shares many of the Staff concerns, and also does not support approval of Spire's currently proposed tariffs in this matter. Furthermore, Consumers Council has consumer protection issues that were not addressed in the utility's testimony, nor were they addressed in the Staff Recommendation.

WHEREFORE, Consumers Council requests a hearing and a procedural schedule with the opportunity to file responsive testimony. Consumers Council could also support consolidation of this case into the pending Spire rate case.

Respectfully submitted,

Dated: March 5, 2021 /s/ John B. Coffman

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 5<sup>th</sup> day of February, 2021.

/s/ John B. Coffman