

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

In the Matter of Spire Missouri, Inc.)
d/b/a Spire (East) Purchased Gas) GR-2021-0127
Adjustment (PGA) Tariff Filing)

In the Matter of Spire Missouri, Inc.)
d/b/a Spire (West) Purchased Gas) GR-2021-0128
Adjustment (PGA) Tariff Filing)

REQUEST FOR EXTENSION OF JULY 18 DUE DATE TO AUG. 1, 2022

Environmental Defense Fund (“EDF”), Office of the Public Counsel (“OPC”), and Consumers Council of Missouri (collectively “Movants”) hereby request that the July 18, 2022 date set in the Commission’s order of May 31, 2022 for “[a]ny other entity wishing to comment on Staff’s recommendation or Spire’s response” be extended to August 1, 2022, and in support thereof state the following:

1. On October 30, 2020, Spire Missouri filed new tariff sheets with proposed new rates to reflect estimated changes in the cost of natural gas.
2. Pursuant to the Commission’s November 2, 2020 Order Directing Expedited Staff Recommendation and Setting Time for any Responses to Tariff Sheets, Environmental Defense Fund, Office of the Public Counsel, Consumers Council of Missouri, and Midwest Energy Consumers Group (“MECG”) filed Comments and a Motion to Establish a Procedural Schedule on November 9, 2020. Staff of the Commission (“Staff”) responded on November 9 and 10, 2022, recommending the Commission approve the tariff sheets filed by the Company on an interim basis, subject to refund, and requesting that the Commission withhold ordering a procedural schedule until Staff had conducted

comprehensive discovery and submitted its final report and recommendations to the Commission in December 2021.

3. The Commission agreed and required Staff to file the results of its ACA review no later than December 15, 2021. Order Approving Spire Missouri's Purchased Gas Adjustment Tariffs of November 12, 2020, effective date November 16, 2020. The Commission also declined to set a procedural schedule. Order Denying Motion to Establish a Procedural Schedule of January 6, 2021.
4. On November 9, Staff filed a request for an extension of time to file its recommendation. In its request, Staff noted, "this ACA case contains unique and very complex issues not considered in previous ACA filings. Notably, this is the first ACA case where costs related to Spire East's contract with Spire STL Pipeline will be considered."
5. The Commission granted Staff's request, as well as an April 21, 2022 request for additional time. Staff ultimately submitted its recommendation on May 27, 2022, with an accompanying report from Schumaker & Company. Staff sought assistance from that outside consultant due to the "sheer size and scope of the decision to enter into a contract with Spire ST Pipeline, and the fact that it is an affiliated transaction." Staff Memorandum of May 27, 2022.
6. The Commission ordered Spire to respond to the Staff recommendation no later than July 11, and set a July 18, 2022 deadline for any other entity wishing to comment on Staff's recommendation or Spire's July 11 response. Order Directing Spire Response and Setting Time for Other Responses of May 21, 2022.

7. Due to the complexity of these matters, the potential of new information coming from the Company in its comments due July 11, and other demands within Movants' organizations, more time is needed to provide adequate comments in this matter.
8. Counsel for EDF has checked with Spire Missouri, Staff, and MECG and understands those parties do not object to this request.

WHEREFORE, Movants request an extension of the July 18, 2022 deadline described above to August 1, 2022.

Dated: July 8, 2022

Respectfully submitted,

ROTHFELDER STERN, L.L.C.



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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Request for Extension of July 18 Due Date to Aug. 1, 2022 was served on Spire Missouri, Inc., Midwest Energy Consumers Group, and Consumers Council of Missouri, the General Counsel of the Staff of the Missouri Public Service Commission and the Office of Public Counsel by United States mail, hand- delivery, email or facsimile on this 8th day of July, 2022.



Martin C. Rothfelder