

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

In the Matter of the PGA Filing of Spire) Case No. GR-2016-0225
Missouri Inc. f/k/a Missouri Gas Energy)

**STAFF REPLY TO SPIRE MISSOURI INC. f/k/a
MISSOURI GAS ENERGY RESPONSE TO STAFF ACA RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission and replies as follows to the *Response to Staff's Recommendation and Memorandum Regarding Missouri Gas Energy's 2015-2016 Actual Cost Adjustment Filing* ("Response") filed herein by Spire Missouri Inc., d/b/a Spire, on behalf of its western Missouri operating unit formerly known as Missouri Gas Energy (hereafter "MGE" or "Company"):

1. Staff filed its Actual Cost Adjustment ("ACA") Recommendation in this case concerning MGE's 2015-2016 ACA filing on December 18, 2017. In its ACA Recommendation, Staff recommended certain adjustments to the Company's filed ACA balance; requested the Company respond to certain other recommendations; and recommended the Commission hold this case open pending resolution of Staff's investigation of Spire's compliance with the requirements of the CAM and Gas Supply and Transportation Standards of Conduct in Case No. GO-2017-0223 and resolution of all prior MGE ACA cases which currently remain open. Staff also requested the Commission direct MGE to meet with Staff to attempt to resolve certain discrepancies noted in Staff's Recommendation.

2. MGE filed its Response on February 1, 2018. In its Response, the Company noted that Company and Staff have arranged a meeting to be held on February 13, 2018, to attempt to resolve the discrepancies noted in Staff's Recommendation, which directly impact Staff's recommended adjustments to the

Company's ACA balance. Based on Staff's Procurement Analysis Unit's review of the Company's Response, MGE's responses relating to all other comments, concerns, and recommendations contained in Staff's ACA Recommendation are acceptable to Staff.

3. Staff recommends the Commission not establish the final balances for MGE's 2015-2016 ACA at this time and further recommends this case remain open pending resolution of Staff's investigation of Spire in Case No. GO-2017-0223 and resolution of all prior MGE ACA cases that remain open.

WHEREFORE, Staff submits this Reply to the *Response to Staff's Recommendation and Memorandum Regarding Missouri Gas Energy's 2015-2016 Actual Cost Adjustment Filing* filed herein on February 1, 2018, and requests that this case remain open¹ pending resolution of Staff's investigation of Spire in Case No. GO-2017-0223 and resolution of all prior MGE ACA cases that remain open.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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¹ The ACA account balances should not be finalized at this time.

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 9th day of February, 2018.

/s/ Jeffrey A. Keevil