

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

In the Matter of the Request of Spire Missouri, Inc.)
d/b/a Spire for Waiver from Commission Rule)
20 CSR 4240-40.030(13) (BB))

Case No. GE-2020-0295

MOTION FOR EXTENSION OF TIME TO FILE STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension of Time to File Staff Recommendation* ("Motion") to July 31, 2020, states as follows:

1. On March 20, 2020, Spire its *Request for Waiver* of Commission Rule 20 CSR 4240-40.030(13)(BB) to allow it to manage its farm taps and to mitigate associated risk through its Distribution Integrity Management Plan ("DIMP"). On March 24th, the Commission issued its *Order Directing Notice, intervention Requests, and Staff Recommendation* ("Order") directing Staff to file its recommendation no later than Sunday, June 21, 2020.

2. Staff is currently awaiting Spire responses to three data requests due June 29th, June 30th, and July 1st. Staff respectfully requests an extension of time to file its recommendation in this matter to July 31, 2020 to allow it additional time necessary to review data request responses, to conduct further discovery as needed, and to prepare its recommendation for the Commission.

WHEREFORE, Staff respectfully requests the Commission grant its Motion for an extension of time to July 31, 2020 to complete its discovery and to prepare its recommendation.

Respectfully submitted,

/s/ Robert S. Berlin

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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 17th day of June, 2020.

/s/ Robert S. Berlin