

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

In the Matter of Spire Missouri Inc.	)	
d/b/a Spire's Compliance with the	)	<b><u>Case No. GO-2019-0040</u></b>
Commission's Order and Stipulation	)	
and Agreement in Case No. GM-2013-0254	)	

**STAFF RESPONSE**

**COMES NOW** the Staff of the Missouri Public Service Commission, through the undersigned counsel, and for its Response to Spire Missouri Inc.'s Request states as follows:

1. On August 20, 2018, Spire Missouri Inc. d/b/a Spire ("Spire") filed a request for a Commission order authorizing Spire to cease filing quarterly certificates of compliance as required by paragraph 16d of the stipulation and agreement in Case No. GM-2013-0254. Spire had previously indicated its intent to simply stop filing the certification, which led Staff to file a Motion to Establish Docket to Enforce Spire Missouri Inc.'s Compliance with Commission Order Approving Unanimous Stipulation and Agreement ("Motion") on August 10, 2018.

2. On August 21, 2018, the Commission issued an Order Directing Response to Spire's Request for Order ("Order") in which the Commission ordered any party who wished to respond to Spire's request to do so no later than September 21, 2018.

3. As stated in footnote 1 of the Commission's Order, "Spire does not request leave to cease complying with the substance of the stipulation and agreement. Rather it asks that it no longer be required to file a quarterly certification of its continued compliance."

4. Recognizing the distinction set forth in the foregoing footnote is critically important because the other provisions of paragraph 16 should remain unchanged (the entirety of paragraph 16 is set forth in Staff's Motion filed herein on August 10) regardless of how the Commission rules on Spire's request. According to Spire's request, Spire is only seeking to be relieved of the requirement to file a quarterly certificate of compliance as required by paragraph 16d.

5. As set forth in Staff's Motion, Spire is to file the quarterly certificates of compliance until the Commission determines one of two things: (1) that the Spire Missouri East and Spire Missouri West Divisions are insulated from Spire Inc.'s (the parent company of Spire Missouri Inc.) other operations and the activities of any of its affiliates, or (2) that the requirement to make the quarterly filing is no longer needed.

6. Staff recommends that the Commission not determine that the Spire Missouri East and Spire Missouri West Divisions have achieved insulation from Spire Inc.'s other operations and the activities of any of its affiliates (number 1 in the preceding paragraph). However, Staff does not oppose removing the quarterly filing requirement in paragraph 16d based on a determination that such filing is no longer needed (number 2 in the preceding paragraph), because the information contained in Spire's quarterly filings has not proven to be as useful as had originally been hoped. As stated above, all other provisions of paragraph 16 should remain unchanged.

**WHEREFORE**, Staff respectfully submits this Response to Spire's request as directed by the Commission's Order Directing Response to Spire's Request for Order issued August 21, 2018.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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Missouri Public Service  
Commission

**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 for parties of record this 21st day of September, 2018.

**/s/ Jeffrey A. Keevil**