

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

In the Matter of the Application of Spire)
Missouri Inc. to Establish an Infrastructure)
System Replacement Surcharge in its Spire) **File No. GO-2020-0229**
Missouri East Service Territory)

In the Matter of the Application of Spire)
Missouri Inc. to Establish an Infrastructure)
System Replacement Surcharge in its Spire) **File No. GO-2020-0230**
Missouri West Service Territory)

**SPIRE MISSOURI INC.’S RESPONSE TO STAFF
IN SUPPORT OF UNANIMOUS STIPULATION AND AGREEMENT**

COMES NOW Spire Missouri Inc., on behalf of itself and its two operating units, Spire East and Spire West (“Spire” or “Company”), and pursuant to the Commission’s April 21, 2020 *Order Directing Filing* in the above-captioned cases, submits the following Response to Staff in Support of the Unanimous Stipulation and Agreement filed in these proceedings on April 16, 2020. In support thereof, Spire states as follows:

1. On April 28, 2020, the Staff of the Missouri Public Service Commission (“Staff”) filed its Verified Response to Order Directing Filing and in Support of Unanimous Stipulation and Agreement. In its Response, the Staff: (a) reiterates its support for the Unanimous Stipulation and Agreement submitted by Spire, the Staff and the Office of the Public Counsel (“OPC”) on April 16, 2020; (b) verifies that the revenue requirements recommended in the Stipulation and Agreement reflect an accurate recovery of replaced facilities; and (c) provides a preliminary estimate of the replacement costs of bare steel facilities that had cathodic protection applied after installation.

2. In response to Staff’s filing, Spire states that it agrees with the statements and

quantifications set forth in Staff's pleading. Like Staff, Spire considers the revenue requirements agreed to by the Signatories to the Unanimous Stipulation and Agreement to be fair and reasonable, and in the public interest.

3. Spire would only add that, while no Signatory has agreed to any ratemaking, legal or other principle, from Spire's perspective, these recommended revenue requirements are *fully* consistent with the Commission's most recent decisions on various ISRS issues. Specifically, in deriving the recommended revenue requirements: (1) amounts associated with ISRS costs not recovered in previous ISRS proceedings have been excluded; (2) amounts relating to the replacement or bypass of plastic components have been excluded using the percentage method previously approved by the Commission; and (3) cast iron and bare steel facilities have been included with the agreement that the inclusion of bare steel that had cathodic protection applied after installation will be subject to potential refund depending on the outcome of the current appeal of that issue.

4. For all of these reasons, Spire recommends that the Commission approve the Unanimous Stipulation and Agreement filed in these cases on April 16, 2020.

WHEREFORE, Spire Missouri Inc. respectfully requests that the Commission accept this Response to Staff's Verified Response and approve the Unanimous Stipulation and Agreement filed in these cases on April 16, 2020.

Respectfully submitted,

/s/ Matthew Aplington,

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 3rd day of May, 2020.

/s/ Goldie T. Bockstruck