

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

In the Matter of Spire Missouri Inc.'s d/b/a            )  
Spire Verified Application for Approval of            )  
Financing Authority    )        **Case No.: GF-2022-0169**

**STAFF'S REPLY TO SPIRE MISSOURI'S  
RESPONSE TO OPC'S RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff") and replies to Spire Missouri's Response to OPC's Recommendation:

1. On January 31, 2022,<sup>1</sup> Staff filed its recommendation ("January 31 Recommendation") concerning the Verified Application for Approval of Financing Authority ("Application") filed by Spire Missouri Inc. ("Spire Missouri") on December 22, 2021.

2. Staff recommended that the Commission grant Spire Missouri financing authority as requested in the application, subject to the eleven conditions specifically set out in the Memorandum attached to the Staff recommendation.

3. On February 10, Spire Missouri filed its response to Staff's recommendation and asked the Commission to approve the application as recommended by the Staff. Also on February 10, the Office of Public Counsel ("OPC") filed its response to Staff's recommendation.

4. On February 14, the Commission issued its Order Directing Responses to Conditions Proposed by OPC and set February 17 as the deadline. On February 17, Staff

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<sup>1</sup> All date references will be to 2022 unless otherwise indicated.

filed a request that the Commission suspend the deadline for Staff's reply, and later on February 17, Spire filed a response to OPC's recommendation ("Spire's Response").

5. On February 18, the Commission issued an Order Shortening the Time for Replies ("Order"). It required that any party wishing to reply to Spire's response do so no later than noon on February 22.

6. The Order summarized Spire's response. In the terms used by the Order in summarizing Spire's response, Staff makes the following reply to Spire's response:

- Suggested typographical corrections to Staff Condition 1;  
Staff's Reply: Staff agrees to the typographical corrections as set out in Spire's Response.
- Edits discussed by Spire and OPC to Staff Condition 7;  
Staff's Reply: Staff agrees to the edits as described in Spire's response.
- Accepts OPC's 2<sup>nd</sup> proposed condition;  
Staff's Reply: Staff accepts OPC's 2<sup>nd</sup> proposed condition as described in Spire's response.
- Offered language addressing OPC's third proposed condition.  
Staff's Reply: Staff accepts the language Spire offers as described in Spire's response.

7. Replying further: Nothing in this pleading withstanding, Staff states that its recommendation that the Commission grant Spire Missouri financing authorization remains substantively at a minimum subject to the eleven conditions set out in the Staff Recommendation filed on January 31.

**WHEREFORE**, Staff respectfully requests that the Commission accept the foregoing reply as compliance with the Commission's Order.

Respectfully submitted,

**/s/ Paul T. Graham**

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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 22<sup>nd</sup> day of February, 2022.

**/s/ Paul T. Graham**