

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

In the Matter of the Application of )  
Spire Missouri Inc. d/b/a Spire )  
for Approval to Establish an On-Bill )  
Financing Program and Cost )  
Recovery Mechanism )

**Case No. GO-2021-0126**  
Tracking Nos. YG-2021-0110;  
YG-2021-0112; YG-2021-0113

**JOINT PROPOSED PROCEDURAL SCHEDULE**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Joint Proposed Procedural Schedule* in this matter hereby states:

1. Spire Missouri, Inc. d/b/a Spire filed its *Verified Application of Spire Missouri Inc. for Approval to Establish an On-Bill Financing Program and Cost Recovery Mechanism for its Missouri Service Territory and Request for Waiver from its 60 Day Notice Rule* along with direct testimony and revised tariff sheets on October 30, 2020. The *Application* seeks approval of a new tariffed program, an on-bill financing program and an associated cost recovery mechanism. Staff reviewed the *Application* and filed a *Motion to Extend* on November 13, 2020. OPC also filed an *Objection and Motion to Dismiss* on November 13, 2020. The Commission on November 18, 2020, ordered responses to OPC's *Objection and Motion* to be filed by November 23, 2020; Staff filed *Recommendation* on February 26, 2021 and several parties filed responses on March 5, requesting that the Commission hear this case separately from the general rate case currently pending. The Commission directed the parties to establish a procedural schedule including a date for an evidentiary hearing.

2. As directed by the Commission, the parties have discussed and come to the following proposed dates and terms in collaboration. The parties request that the Commission adopt the following procedural schedule:

<b><u>Activity</u></b>	<b><u>Date</u></b>
Initial Case Filing	October 30, 2020
Non-Company Rebuttal Testimony	April 21, 2021
All Party Surrebuttal Testimony	May 13, 2021
Settlement Conference	May 20, 2021
Discovery Cutoff	May 21, 2021 <sup>1</sup>
List of Issues, Order of Witnesses And Order of Cross-Examination	June 1, 2021
Statement of Positions	June 4, 2021
Evidentiary Hearing	June 10, 2021
Initial Briefs	June 23, 2021
Reply Briefs	July 7, 2021
Effective Date of Tariff	September 29, 2021

3. Workpapers prepared in the course of developing a witness' testimony including schedules (whether filed separately or as part of a report) shall not be filed with the Commission, but shall be provided to each party within two (2) business days following the filing of the relevant testimony. Workpapers containing confidential information should be marked in compliance with 20 CSR 4240-2.135. Counsel for each party shall undertake to advise other counsel if a sponsored witness has no workpapers associated with a specific piece of testimony. Where workpapers include models, spreadsheets or similar documents originally

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<sup>1</sup> This designates the final day by which to issue new data requests, to request any written discovery, and by which to conduct depositions.

in a commonly available format, in which inputs or parameters may be changed to observe changes in inputs or outputs, if available in that original format, the party providing the workpaper shall provide this type of information in that original format with formulas intact. Workpapers shall be provided in electronic format by email or on a compact disc or other electronic storage media where appropriate.

4. The parties request that the Commission adopt the following discovery procedures:

a. All parties shall provide copies of testimony including schedules, exhibits and pleadings to other counsel of record by electronic means and in electronic form concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format. Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchange.

b. Parties shall treat all confidential information with the appropriate designation and comply with all provisions of 20 CSR 4240 2.135.

c. Data requests (DR) issued to or by Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System (EFIS). If this is not feasible, Staff shall be contacted to arrange an appropriate alternative. Counsel for each party shall receive electronically from each party serving a DR, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued DRs, if the description contains confidential information, or is voluminous, a hyperlink to

the EFIS record of that DR shall be considered a sufficient copy. If a party desires a copy of the responses to DRs served on another party, the party desiring a copy must request that copy from the party responding to that DR. DRs shall be emailed to counsel for the other parties to this matter. Counsel may designate other personnel to be added to a service list for DRs, but shall assume the responsibility for enforcing such a request and ensuring the preservation of confidentiality. DR responses should be served on counsel for the requesting party electronically, if feasible, pursuant to Commission rules. The Company's responses to Staff's DRs will be available to other parties on EFIS.

d. The response time for all DRs is measured in calendar days. DRs issued after 5:00 p.m. are treated as having been issued the following calendar day. Pursuant to 20 CSR 4240-2.090.2(D) the response time for DRs is 10 calendar days from the date of request with objections being served no later than 3 business days from the request date. After the filing of rebuttal testimony on April 21, 2021, the parties recommend shortening the DR response time to 5 calendar days with 3 business days to object.

e. Discovery disputes should be handled in accordance with 20 CSR 4240-2.090.8. The parties commit to resolve discovery disputes without Commission intervention to the extent possible.

f. Data request responses containing models, spreadsheets or similar documents originally in a commonly available format, in which inputs or

parameters may be changed to observe changes in inputs or outputs, as discussed above should be provided in their original format with formulas intact.

g. Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all parties via email.

**WHEREFORE**, Staff prays that the Commission will accept this *Joint Proposed Procedural Schedule*; will issue an order in accordance with this proposed schedule; and grant such other and further relief as the Commission considers just in the circumstances.

**/s/ Whitney Payne**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 19<sup>th</sup> day of March, 2021, to all counsel of record.

**/s/ Whitney Payne**