BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc. d/b/a Spire's Request to Decrease Its WNAR In the Matter of Spire Missouri Inc. d/b/a Spire's Request to Increase Its WNAR))	Case No. GO-2019-0058 Case No. GO-2019-0059
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LIST OF ISSUES, IDENTIFICATION OF WITNESSES, AND ORDER OF CROSS-EXAMINATION

COMES NOW the Staff of the Missouri Public Service Commission, pursuant to the Commission's *Order Adopting Procedural Schedule* ("Order") issued herein on October 19, 2018, and submits the following List of Issues, Identification of Witnesses, and Order of Cross-Examination, and in support thereof states as follows:

- 1. On August 31, 2018, Spire Missouri Inc. d/b/a Spire ("Spire") filed a tariff sheet to decrease Spire Missouri East's weather normalization adjustment rider ("WNAR") rate; this case has been docketed as Case No. GO-2019-0058. Also on August 31, 2018, Spire filed a tariff sheet to increase Spire Missouri West's WNAR rate; this case has been docketed as Case No. GO-2019-0059. On September 14, 2018, Staff filed recommendations in both cases that the Commission reject the tariff sheets filed by Spire in both cases because Spire did not properly calculate the WNAR rates. Although the cases have not been formally consolidated, the Commission's Order adopted a joint procedural schedule for both cases.
- 2. The parties to this joint proceeding are Spire Missouri Inc. ("Spire") on behalf of both its Spire Missouri East and Spire Missouri West operating units, Staff of

the Missouri Public Service Commission ("Staff"), and the Office of the Public Counsel ("OPC").

3. Pursuant to the Commission's October 19 Order, the parties were to agree upon and Staff was to file "a list of the issues to be heard, the witnesses to appear on each day of the hearing, the order in which they will be called, and the order of cross-examination for each witness." Staff reached out to the parties to this case and now files this pleading in satisfaction of that directive. However, as recognized by the Commission, "not all parties may agree upon how each issue should be described, or on whether a listed issue is in fact a proper issue." With the understanding that not all parties may agree upon how the following are described or if each listed issue is in fact a proper issue, Staff submits the following:

<u>List of Issues</u>

(1) Does the Weather Normalization Adjustment Rider ("WNAR") tariff language of Spire Missouri East and Spire Missouri West [i.e., P.S.C. MO. No. 7, Sheet No. 13 and P.S.C. MO. No. 8, Sheet No. 13] which was ordered in the Commission's Amended Report and Order in Case Nos. GR-2017-0215 and GR-2017-0216 mean (a) that daily normal weather ranked on current accumulation period actual daily temperature data and compared to current accumulation period actual daily weather should be used for purposes of calculating the WNAR adjustments or (b) that daily normal weather ranked on 2016 actual daily temperature data and compared to current accumulation period [2018 in this case] actual daily weather should be used for purposes of calculating the WNAR adjustments?

(2) If the Commission determines that the weather normalization adjustment

rider ("WNAR") tariff sheets of Spire Missouri East and/or Spire Missouri West

[i.e., P.S.C. MO. No. 7, Sheet No. 13 and P.S.C. MO. No. 8, Sheet No. 13,

respectively] are vague regarding how the WNAR rate adjustments are to be

calculated, is Staff's or Spire's interpretation of the tariff and calculation method

most consistent with the Commission's intent when it ordered adoption of

the WNAR tariff?

Order of Witnesses

Beginning on January 15, 2019, witnesses will appear in the following order and continue on to the following day (January 16), if necessary:

Spire ---- Weitzel

Staff ---- Won, Stahlman, Kliethermes

OPC ---- Mantle

Order of Cross-Examination

Spire's witnesses: OPC, Staff

Staff's witnesses: OPC, Spire

OPC's witnesses: Staff, Spire

Order of Opening Statements

Spire

Staff

OPC

WHEREFORE, Staff submits this List of Issues, Identification of Witnesses, and Order of Cross-Examination as ordered by the Commission.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 7th day of January, 2019.

/s/ Jeffrey A. Keevil