

**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)	Case No. GO-2021-0126
Financing Program and Cost)	
Recovery Mechanism)	

OBJECTION and MOTION TO DISMISS

COMES NOW the Office of the Public Counsel (“OPC”) and for its Objection and Motion to Dismiss states as follows:

1. On October 30, 2020, Spire Missouri Inc. d/b/a Spire filed an application to modify its current on-bill financing program by eliminating the credit check requirement, and to establish a new cost recovery mechanism for costs associated with the program.¹

2. On November 2, 2020, the Commission directed, “objections to the application and tariffs or requests for hearing shall be filed no later than November 13, 2020.”

3. The OPC is generally supportive of on-bill financing programs, including Pay As You Save (PAYS®) programs (which the OPC has proposed for Missouri’s electric providers). However, Spire’s application is notably lacking in the basic detail and explanation necessary for approval.

4. Spire’s application does not provide sufficient information to determine whether the proposed changes are lawful and/or in the public

interest. Spire's application does not cite to any legal authority for Spire to implement the cost recovery mechanism nor does it identify what costs Spire seeks to recover through the mechanism. Accordingly, the OPC objects to and requests a Commission order dismissing the application because Spire has not met its burden of demonstrating that the Commission has the necessary legal authority to approve the cost recovery mechanism nor has Spire provided sufficient details of the mechanism.²

5. Alternatively, the OPC requests the Commission suspend the proposed tariff changes and direct the parties to propose a procedural schedule that includes an evidentiary hearing.

WHEREFORE, the Office of the Public Counsel respectfully objects to the application, moves the Commission to dismiss the application without prejudice, and alternatively requests the Commission suspend the proposed tariff changes and direct the parties to agree upon and file a proposed procedural schedule.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: /s/ Marc D. Poston
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¹ See Attachment A for Spire's proposed tariff changes.

² 20 CSR 4240-2.116(4); 20 CSR 4240-2.117(2); Sections 386.430 and 393.150 RSMo.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 13th day of November 2020.

/s/ Marc Poston
