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	Case No. GO-2021-0126
Approval to Establish an On-Bill	Tracking Nos. YG-2021-0110;
Financing Program and Cost) YG-2021-0112; YG-2021-0113
Recovery Mechanism)

JOINT MOTION REGARDING PROPOSED PROCEDURE

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, on behalf of Spire Missouri, Inc. d/b/a Spire and the Office of the Public Counsel (OPC), and for its *Joint Motion Regarding Proposed Procedure* 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's recommendation to be filed by December 14, 2020; and a procedural conference to be held on December 18 at 10 a.m. The order also suspended effective date of the tariff the proposed sheets to January 28, 2021.

- 2. After some discussions following the filing of Staff's *Motion*, the parties have determined that the best way to proceed with this matter at this time is to arrange some technical conferences to address their questions in the proposal, as well as allow some additional opportunities for discovery. Renew Missouri was granted intervention in the docket on November 17, 2020, and the Consumers Council of Missouri filed to intervene, however the other parties have not had an opportunity to discuss with these entities. The parties further agree that Spire may file some additional supporting testimony or documentation in the docket in response to the technical conferences and/or discovery requests. Therefore, the parties ask that they be permitted time to organize and meet, prior to filing a procedural schedule or Staff recommendation in this matter. Once we believe that the investigatory process is complete, we will jointly file notice with either a proposed procedural schedule or other recommendation to the Commission. The parties do not believe that the scheduled procedural conference is necessary at this time, however, if the Commission wishes to proceed with the conference the parties are happy to comply.
- 3. To that end, Staff now asks on behalf of itself, Spire, and OPC to delay an ordered date for the Staff recommendation, or a proposed procedural schedule. The parties will utilize the time between this date and the present effective date of the proposed tariffs resulting from the Commission's ordered suspension to hold the aforementioned technical conferences and reach out to the intervening party(ies). This filing is not meant to prohibit any party from filing a response to OPC's Objection and Motion to Dismiss as ordered by the Commission to be filed no later than November 23, 2020.

WHEREFORE, Staff prays that the Commission will accept this *Motion*; permit the parties to file notice at such time as they have completed their investigation and are ready to proceed with a formal procedural schedule or other action; and that it grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne
Senior Counsel
Missouri Bar No. 64078
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
whitney.payne@psc.mo.gov

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 20th day of November, 2020, to all counsel of record.

/s/Whitney Payne