

**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) Case No. GF-2022-0169
Financing Authority)

RESPONSE TO SPIRE MISSOURI’S RESPONSE TO OPC RECOMMENDATION

COMES NOW the Office of the Public Counsel (the “OPC”) and in response to Spire Missouri Inc.’s (“Spire Missouri”) Response to OPC’s Recommendation (the “Spire Missouri Recommendation”) (Doc. 10)¹ and the Public Service Commission of the State of Missouri’s (the “Commission”) Order Shortening Time for Replies (Doc. 11) respectfully states:

The proposed language found in the Spire Missouri Recommendation reflects the agreement reached by the OPC and Spire Missouri. Therefore, the OPC requests that if the Commission approves Spire Missouri’s Verified Application for Approval of Financing Authority and Request for Waiver of 60 Day Notice Rule and Motion for Expedited Treatment (the “Application”) (Doc. 1), the Commission modify the conditions included in the Staff of the Public Service Commission of the State of Missouri’s (the “Staff”) Recommendation (Doc. 5) to reflect the language found in the Spire Missouri Recommendation.

I. Background

On December 22, 2021, Spire Missouri filed the Application.

On January 31, 2022, the Staff filed its Recommendation. The Staff recommended that the Commission grant Spire Missouri’s request for financing authority, subject to eleven (11) conditions. (Recommendation 2, Doc. 5; Staff Memo. 5–6, Doc. 5).

¹ References to document numbers represent the document numbers assigned in the Electronic Filing Information System (“EFIS”).

On February 10, 2022, Spire Missouri filed a Response to the Staff’s Recommendation, stating that it “has reviewed the language proposed by Staff” and “[g]enerally . . . agrees to Staff’s recommended conditions.” (Resp. 1, Doc. 6).

On that same day, the OPC also filed a Response to Staff Recommendation. (Doc. 7). The OPC requested that if the Commission grants Spire Missouri’s Application, the Commission make three modifications to the Staff’s recommended conditions, specifically, modify the language of the Staff’s recommended Condition 7 and include two additional conditions. (*See generally id.*).

The Commission ordered Spire Missouri to respond to the OPC’s recommendations and allowed other parties to respond as well. (Doc. 8).

On February 17, 2022, Spire Missouri filed the Spire Missouri Recommendation, describing its proposed changes to the Staff’s Condition 1, the Staff’s Condition 7, the OPC’s Second Proposal, and the OPC’s Final Proposal.

On February 18, 2022, the Commission ordered that any party who wished to respond to the Spire Missouri Recommendation do so no later than February 22, 2022, at 12:00 p.m.

II. Response

The OPC has engaged in discussions with Spire Missouri regarding the language of the conditions addressed in the Spire Missouri Recommendation. The language reflected in the Spire Missouri Recommendation for each of the conditions addressed, reflects the OPC and Spire Missouri’s agreement reached as a result of those discussions. Therefore, the OPC does not oppose the changes reflected in the Spire Missouri Recommendation.

III. Conclusion

WHEREFORE, the Office of the Public Counsel respectfully requests that if the Commission grants Spire Missouri’s Application, the Commission modify the conditions included

in the Staff's Recommendation to reflect the OPC and Spire Missouri's agreed upon language as reflected in the Spire Missouri Recommendation.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this 22nd day of February 2022.

/s/ Lindsay VanGerpen