

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

In the Matter of Staff's Investigation of Spire)
STL Pipeline's Application at FERC for a)
Temporary Certificate to Operate) **File No. GO-2022-0022**

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its *Staff Recommendation*, states as follows:

1. On November 18, 2021, the Commission issued its *Order Directing Spire Missouri to Cooperate with Staff in Communicating with Customers* ("Order"), in which the Commission directed Staff to "file a recommendation...indicating whether a complaint against Spire Missouri is warranted for ... failure to ensure the availability of sufficient gas supplies for the upcoming winter heating season."

2. On December 3, 2021, the Federal Regulatory Commission (FERC) issued an *Order Issuing Temporary Certificate* ("Temporary Certificate") for Spire STL Pipeline. The Temporary Certificate will remain in effect until FERC issues its order in the remand proceedings. FERC's issuance of the Temporary Certificate for Spire STL Pipeline obviates, or mitigates, concerns about the availability of transportation and storage resources needed to meet Spire Missouri's planned peak demand for the winter of 2021-2022.

3. In addition, Staff submitted data requests to Spire Missouri in this matter and, among other things, Staff requested information from Spire Missouri related to storage balances and its currently contracted supply for winter 2021-2022. Based upon the information provided by Spire Missouri in its response to Staff Data Request No. 32, Spire Missouri's approach to acquiring supply and storage resources was similar to the previous year.

4. Staff has found no evidence that Spire Missouri failed to ensure the availability of sufficient gas supplies for the upcoming (and now current) winter heating season. From a supply, transportation, and storage standpoint, Staff recommends that this aspect of the investigation be closed, subject to Spire Missouri's continued obligation to provide periodic reports on its contingency plans as ordered by the Commission in this matter on September 1, 2021.

5. Staff notes that its investigation regarding Spire Missouri's communications with its customers regarding the operation of Spire STL Pipeline since June 22, 2021, is ongoing. Staff intends to file its report in this matter on this aspect of the investigation no later than January 21, 2022, as directed by the Commission in its Order. Staff will make any further recommendations pertinent to Spire Missouri's customer communications in this forthcoming report.

WHEREFORE, Staff respectfully requests the Commission accept this *Staff Recommendation*; and grant such other and further relief as the Commission considers reasonable in the circumstances.

Respectfully submitted,

/s/ Jamie S. Myers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 4th day of January, 2022.

/s/ Jamie S. Myers

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AFFIDAVIT OF DAVID M. SOMMERER

STATE OF MISSOURI)
)) ss.
COUNTY OF COLE)

COMES NOW David M. Sommerer, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation*; and that the same is true and correct according to his best knowledge and belief, under penalty of perjury.

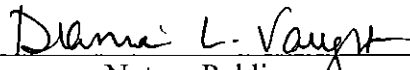
Further the Affiant sayeth not.



David M. Sommerer

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 4th day of January, 2022.



Notary Public

