

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

In the Matter of Spire Missouri Inc.’s d/b/a Spire Missouri East )  
and Spire Missouri West Filing of Its Proposed Weather ) File No. GO-2022-0070  
Normalization Adjustment Rider (WNAR) Tariff Sheets )

**SPIRE MISSOURI INC’S RESPONSE TO STAFF’S RECOMMENDATION**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and files its Response to Staff’s Recommendation and in support thereof respectfully states as follows:

1. On September 1, 2021, Spire Missouri filed Application to Update its Weather Normalization Adjustment Rider (WNAR) and proposed tariff revisions JG-2022-0047 and JG-2022-0048.
2. On September 2, 2021, the Missouri Public Service Commission (“Commission”) issued an Order Directing Staff Recommendation and Setting Time for Responses (“September 2 Order”), which gave Staff of the Missouri Public Service Commission (“Staff”) up to September 10, 2021 to file its recommendation and directed any other entity that wanted to respond to the tariff changes or Staff’s recommendation to do so by September 13, 2021.
3. On September 10, 2021, Staff filed its Recommendation recommending that the Commission reject the Company’s Proposal and to implement Chapter 13 rules to address any over/under charges that are involved in this case.
4. Spire Missouri is filing this Response to comply with the September 2 Order.
5. In response to Staff’s Recommendation, Spire Missouri asserts that the appropriate mechanism to account for over/under charges in this instance is to follow the Company’s tariff. Pursuant to that tariff, the Company filed its WNAR tariffs to

include the billing error amount in the semi-annual reconciliation rate (“SRR”) portion of the rate, which is the procedure specified in the Company’s WNAR tariffs. The SRR would be billed to our customers based on their usage from October 2021 through September 2022, which spreads the amount over 12 months based on usage going forward.

6. Spire’s tariffs state:

Semiannual Reconciliation Rate (“SRR”): Two (2) months prior to the end of the twelve(12) months of billing of each CSWNA, the over- or under-billing of the numerator of the CSWNA shall be calculated based on ten (10) months actual sales and two (2) months projected sales. The amount of over- or under-billing shall be adjusted as ordered by the Commission, if applicable. The resulting amount shall be divided by the annual volumetric billing determinates set for the residential rate class in the most recent rate case. Two (2) months prior to the end of the twelve (12) months of billing of each SRR, the over- or under-billing of the SRR shall be calculated based on ten (10) months actual sales and two (2) months projected sales. Any remaining over- or under- billing from the SRR shall be applied to the next SRR. The two (2) months projected sales associated with each CSWNA and SSR shall be trued-up with actuals upon calculation of the next applicable SSR.

P.S.C. MO No. 7, (Spire East), and P.S.C. MO No. 8, (Spire West), Sheet 13.1

7. Commission Rule 20 CSR 4240.080(13) allows Parties ten (10) days to respond to any pleading *unless otherwise ordered by the Commission*. Given the Commission’s September 2 Order required Staff to file its response on the 10<sup>th</sup> (a Friday), coupled with the September 2 Order requiring responses be filed by September 13<sup>th</sup> which is a Monday, Spire has had only one business day to review and consider Staff’s Recommendation. Since this response is due one business day after Staff’s recommendation was filed, Spire requests additional time to further assess and consider Staff’s Recommendation. Spire hereby requests until September 20, 2021 to file a more complete response to Staff’s recommendation.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission allow additional time, until September 20, 2021, to respond to the Staff's Recommendation.

Respectfully requested,

SPIRE MISSOURI INC.

By: **/s/Goldie T. Bockstruck**  
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**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on all parties of record on this 13<sup>th</sup> day of September 2021 by e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

**/s/ Goldie T. Bockstruck**