

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

In the Matter of Spire Missouri, Inc. d/b/a Spire )	<b><u>File No. GR-2021-0127</u></b>
(East) Purchased Gas Adjustment (PGA) )	Tariff No. YG-2021-0110
Tariff Filing )	

In the Matter of Spire Missouri, Inc. d/b/a Spire )	<b><u>File No. GR-2021-0128</u></b>
(West) Purchased Gas Adjustment (PGA) )	Tariff No. YG-2021-0111
Tariff Filing )	

**ADDITIONAL STAFF RESPONSE TO STAFF'S NOVEMBER 10<sup>TH</sup> RESPONSE  
TO COMMENTS AND MOTION TO ESTABLISH PROCEDURAL SCHEDULE OF THE  
ENVIRONMENTAL DEFENSE FUND, OFFICE OF THE PUBLIC COUNSEL,  
MIDWEST ENERGY CONSUMERS GROUP AND CONSUMER COUNCIL  
OF MISSOURI**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Additional Response* states its purpose is to renew the Staff's *November 10<sup>th</sup> Response* to parties' motion and comply with the Commission's November 12<sup>th</sup> *Order Approving Spire Missouri's Purchased Gas Adjustment Tariffs* (Order) which also approved Staff's November 9<sup>th</sup> recommendation to file its 2019-2020 Actual Cost Adjustment (ACA) Report no later than December 15, 2021, states as follows:

1. The Commission's November 12<sup>th</sup> *Order* did not acknowledge Staff's *November 10<sup>th</sup> Response* to the parties' motion, but may not have had time to take it up before issuing its *Order*. That same day Spire also filed, in part, its *Reply in Support of Staff's Response*.

2. In the interest of not burdening the record with redundant narrative, Staff respectfully directs the Commission to its *November 10<sup>th</sup> Response* for a detailed explanation of the discovery process Staff will follow to thoroughly review and

investigate the prudence, rule, and tariff compliance of Spire's 2019-2020 gas supply portfolio.

3. As ordered by the Commission on November 12<sup>th</sup>, Staff will report its results in its 2019-2020 ACA report *to be filed no later than December 15, 2021*. Upon that filing, the parties will have had the benefit of extensive discovery upon which to base responsive filings to Staff's report that may identify issues in dispute for which a procedural schedule may be appropriate. This process ensures the opportunity for parties' concerns to be heard with ample opportunity, if needed, for intervention, discovery, testimony, and hearing.

4. Staff cannot emphasize enough the importance of it being allowed sufficient time to perform its extensive discovery and analyses of a multitude of complex gas supply decisions made by Spire during the 2019-2020 ACA period. The Procurement Analysis Department (PAD) of Staff performs this near year-long essential duty for all gas distribution companies rate-regulated by the Commission. This forms PAD's main workload that is the primary mission of the PAD Staff and ultimately one of the primary missions of the Commission.

5. As explained in Staff's *November 10<sup>th</sup> Response* to the parties' motion, the parties will have ample opportunity to identify and address issues upon the completion and filing of Staff's December 2021 report and recommendations as ordered by the Commission.

6. Again, as explained in Staff's *November 10<sup>th</sup> Response* and its *Additional Response* above, it is premature to order a procedural schedule in the above-captioned cases. The parties' motion for procedural schedule evinces an affiliate transaction issue of interest that is shared by Staff and will be addressed in Staff's report and the initial

issuance of its standard package of 110 Data Requests due to be issued each to Spire East and Spire West in early January 2021. Staff is well aware of the case law requiring purchased gas charges to be just and reasonable and to be prudently incurred.

**WHEREFORE**, Staff prays the Commission accept its *November 10<sup>th</sup> Response* and its *Additional Response* above and withhold the ordering of a procedural schedule until such time as Staff has had the opportunity to initiate comprehensive discovery and to perform its duty to review and analyze Spire's gas purchasing decisions for the 2019-2020 ACA period and to file its final report and recommendations to the Commission in December 2021 as ordered by the Commission in its *November 12<sup>th</sup> Order*.

Respectfully submitted,

**/s/ Robert S. Berlin**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 30<sup>th</sup> day of November 2020.

**/s/ Robert S. Berlin**