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

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In the Matter of Spire Missouri Inc.'s Verified Application for an Accounting Authority Order Related to COVID-19 Impacts

Case No. GU-2020-0376

## Joint Motion for Expedited Consideration of Unanimous Stipulation and Agreement

The Office of the Public Counsel (OPC), on behalf of Spire Missouri Inc. (Spire), Renew Missouri, National Housing Trust, Missouri Industrial Energy Consumers, and Midwest Energy Consumers Group, submit this this Motion for Expedited Consideration as follows:

1. Spire, on behalf of all parties to the above captioned case, filed a Unanimous Stipulation and Agreement on September 15, 2020, resolving all outstanding issues.

2. The next day, Spire filed a joint motion to suspend the procedural schedule and requesting expedited treatment for the Public Service Commission (Commission) to approve the unanimous stipulation and agreement.

3. The Unanimous Stipulation and Agreement provides, among many terms, Spire with the authority to utilize deferral accounting to track incremental costs and cost savings related to the COVID-19 pandemic.

4. The Unanimous Stipulation and Agreement also institutes a COVID-19 Arrearage Management Program. The Program would help customers pay their natural gas bill by providing eligible customers an initial \$100 bill credit, followed by matching contributions from Spire for every dollar customers pay towards their arrearage, up to \$300. The parties intend this Program to help alleviate real financial burdens facing those customers who have faced, and continue to experience, economic hardship during a

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pandemic.

5. Spire requested expedited consideration of the Unanimous Stipulation and Agreement, including the COVID-19 Arrearage Management Program term, so that customer assistance would become readily available for natural gas customers as the heating season rapidly approaches. Spire requested a Commission ruling by September 30, 2020.

6. The date by which Spire requested an expedited decision has passed without action by the Commission. The longer the Commission delays action, the number of customers who will not be able to take advantage of the Program will grow, and arrearages will only intensify.

Wherefore, the OPC renews Spire's request for expedited treatment of the Unanimous Stipulation and Agreement, and requests that the Commission rule upon the requested relief as soon as possible.

Respectfully,

<u>/s/ Caleb Hall</u> Caleb Hall, #68112 Senior Counsel 200 Madison Street, Suite 650 Jefferson City, MO 65102 P: (573) 751-4857 F: (573) 751-5562 Caleb.hall@opc.mo.gov

Attorney for the Office of the Public Counsel

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 1st Day of October, 2020, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall