

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

In the Matter of the Notice and Application of)	
Spire Missouri Inc. Regarding Completion of)	
Its Residential and Small Commercial Service/)	
Yard Line Replacement Program and)	Case No. GE-2020-0294
Program to Address Remaining Yard Lines Owned)	
By its Commercial and Industrial Customers in)	
its Spire East and Spire West Service Territories)	

**SPIRE MISSOURI INC'S REQUEST FOR
WAIVER OF 60-DAY NOTICE RULE**

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of its operating units, Spire Missouri East ("Spire East") and Spire Missouri West ("Spire West") and, pursuant to Commission Rule 20 CSR 4240-4.017(1)(D), files this request for waiver of the notice provisions of Rule 20 CSR 4240-4.017(1), respectfully stating as follows:

1. On March 20, 2020, Spire Missouri filed an application for approval of its yard line replacement program and inadvertently left out a request for waiver from the Commission's 60-day notice of case filing.

2. On March 24, 2020, the Commission issued its *Order Directing Notice and Setting Deadlines for Intervention Applications and Staff's Recommendation*, where the Commission directed the Company to submit a request for waiver of the Commission's 60-day notice of case filing requirement.

3. Commission Rule 20 CSR 4240-4.017(1) provides, in part, as follows:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely

to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

4. Rule 20 CSR 4240-4.017(1)(D) permits a party to request a waiver of the above cited rule for good cause. The rule provision specifically provides that good cause may be established by submitting a verified declaration that the filing party has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. The Company interprets this to mean that good cause is established if the filing party has had no communication with a member of the office of the Commission outside of pleadings or other public communications. Subject to that understanding, the Company has attached to this request a verified declaration that neither the Company nor any person or entity acting on behalf of the Company or its Missouri operating units, has had a communication with a member of the office of the commission in the last 150 days regarding any substantive issues that are likely to arise in the case. For that reason, the Company requests that the Commission grant a waiver of the 60-day notice requirement for Spire Missouri's March 20, 2020 application for approval of its yard line replacement program.

WHEREFORE, Spire Missouri, Inc. respectfully requests that the Commission waive the 60-day notice requirements of Commission Rule 20 CSR 4240-4.017(1) for the above captioned case filing.

Respectfully submitted,

/s/*Goldie T. Bockstruck*

Goldie T. Bockstruck #58759

Director, Associate General Counsel

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ATTORNEY FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been duly served upon the General Counsel of the Staff and on the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 7th day of April, 2020.

/s/*Goldie T. Bockstruck*

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AFFIDAVIT OF NICOLE CHRISTIANER

STATE OF MISSOURI)	
)	SS.
CITY OF ST. LOUIS)	

Nicole Christianer, of lawful age, being first duly sworn, deposes and states:

1. My name is Nicole Christianer. I am the Manager of Pipeline Safety-Distribution for Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri, 63101.

2. I hereby swear and affirm that I have read the foregoing Request for Waiver, and hereby declare that, other than pleadings or other public communications, Spire Missouri Inc., has had no communication with the office of the Commission, within the prior one hundred and fifty (150) days regarding any substantive issue likely to be in the above referenced case.

3. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.



Nicole Christianer (Apr 6, 2020)

Nicole Christianer