

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

In the Matter of the Application of)	
Spire Missouri Inc. d/b/a Spire)	<u>Case No. GO-2021-0126</u>
for Approval to Establish an On-Bill)	Tracking Nos. YG-2021-0110;
Financing Program and Cost)	YG-2021-0112; YG-2021-0113
Recovery Mechanism)	

STAFF RESPONSE TO OPC OBJECTION AND MOTION TO DISMISS

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response to OPC Objection and Motion to Dismiss* in this matter hereby states:

1. Spire Missouri, Inc. d/b/a Spire filed its *Verified Application of Spire Missouri Inc. for Approval to Establish an On-Bill Financing Program and Cost Recovery Mechanism for its Missouri Service Territory and Request for Waiver from its 60 Day Notice Rule* along with direct testimony and revised tariff sheets on October 30, 2020. The *Application* seeks approval of a new tariffed program, an on-bill financing program and an associated cost recovery mechanism. Staff reviewed the *Application* and filed a *Motion to Extend* on November 13, 2020. The Office of the Public Counsel (OPC) also filed an *Objection and Motion to Dismiss* on November 13, 2020. The Commission on November 18, 2020, ordered responses to OPC's *Objection and Motion* to be filed by November 23, 2020; Staff's recommendation to be filed by December 14, 2020; and a procedural conference to be held on December 18 at 10 a.m. The order also suspended the effective date of the proposed tariff sheets to January 28, 2021.

2. In response to OPC's *Objection and Motion to Dismiss* Staff recommends that Spire has provided insufficient information to support its *Application* initially, as previously stated in Staff's *Motion to Extend*. Staff suggests that the proposed procedure

the parties presented in their *Joint Proposed Procedure* filing is the proper way to advance this proceeding.

WHEREFORE, Staff prays that the Commission will accept this *Response*; and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 23rd day of November, 2020, to all counsel of record.

/s/ Whitney Payne