

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

In the Matter of Spire Missouri Inc.'s) **Case No. GT-2020-XXXX**
Proposed School Transportation Tariff Filing) Tariff Filing No. JG-2020-0105

**MOTION TO OPEN DOCKET AND SUSPEND TARIFF SHEET
FOR ADDITIONAL 120 DAYS**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion to Open Docket and Suspend Tariff Sheet for Additional 120 Days* (“Motion”), respectfully states as follows:

1. On December 18, 2019, Spire Missouri Inc. d/b/a Spire (“Company”) filed a revised tariff sheet, P.S.C. MO. No. 7 First Revised Sheet No. 15.1 (JG-2020-0105) to change the current requirement of Spire East to release Mississippi River Transmission (MRT) capacity to the schools as part of its tariffed school transportation program. Tariff Sheet 15.1 bears an effective date of January 17, 2020.

2. The effect of this proposed school tariff change relaxes the current provision allowing the release of any firm pipeline capacity to the schools in the program. The current tariff provision contemplates a specific pipeline (MRT) for capacity release related to the school transportation program. Under the proposed tariff change, all pipelines serving the St. Louis service area would be made available to serve the schools. This change could create a preference for gas marketers to request the release of pipeline capacity that works to the expense of Spire’s PGA sales customers. PGA sales customers are residential and small business customers.

3. By way of further explanation, Spire’s Southern Star Central Gas Pipeline (Southern Star) and Panhandle Eastern Pipeline Company (PEPL) capacity tends to access less expensive supply areas and this fact inures to the benefit of Spire’s sales

customers. This and the fact that Spire's capacity for the Southern Star and PEPL/MoGas Pipeline city-gates are much more limited than its MRT capacity, and now including the Spire STL capacity, creates an issue of whether gas marketers will be allowed preferential access to certain city-gates and whether such access creates an expense and detriment to Spire's PGA sales customers.

4. Because the effects of Spire's proposed school tariff change are unknown at this time, additional discovery is needed for Staff to more thoroughly evaluate the proposed tariff change. Staff proposes this tariff sheet be suspended 120 days to allow Staff sufficient time to conduct the detailed discovery necessary for Staff to make an informed recommendation to the Commission on whether Spire's proposed school tariff change filing should be accepted, modified, or denied. Depending on discovery, Staff intends to file its recommendation as soon as possible.

WHEREFORE Staff respectfully requests that the Commission issue an order 1) creating a new case docket; 2) suspending the Company's revised tariff sheet, P.S.C. MO. No. 7 First Revised Sheet No. 15.1 (JG-2020-0105) for 120 days, with an effective date no sooner than May 17, 2020; and 3) directing Staff to file either a recommendation or a status report no later than May 5, 2020, informing the Commission when it will file a recommendation.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin

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Missouri Public Service Commission

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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 counsel of record this 31st day of December, 2019.

/s/ Robert S. Berlin