

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

In the Matter of Spire Missouri, Inc.'s d/b/a	)	
Spire Request for Authority to Implement a	)	
General Rate Increase for Natural Gas	)	File No. GR-2021-0108
Service Provided in the Company's	)	
Missouri Service Areas	)	

**RESPONSE OF VICINITY ENERGY KANSAS CITY AND MIDWEST ENERGY  
CONSUMERS GROUP TO ORDER DIRECTING EXPEDITED RESPONSES TO  
COMPLIANCE TARIFF AND MOTION TO REJECT COMPLIANCE TARIFF**

**COME NOW** Vicinity Energy Kansas City, Inc. (“Vicinity”) and the Midwest Energy Consumers Group (“MECG”) and for their Response to Order Directing Expedited Responses to Compliance Tariff and Motion to Reject Compliance Tariff in this matter, hereby state as follows:

1. On July 30, 2021, a Partial Stipulation and Agreement (“the July 30 Stipulation”) was filed by most of the parties to this case. Among other provisions, the signatories to the July 30 Stipulation agreed that:

the provisions of the Spire West Large Volume rate schedules pertaining to transportation service will be moved to new schedules to be titled “Large Volume Transportation Service.” All provisions including rates will remain unchanged (unless minor, non-substantive formatting changes are made necessary by the move) except that the Fixed Monthly Charge will increase from \$1095.27 to \$1145.90.

2. On September 15, the Missouri Public Service Commission (“Commission”) issued an Order Approving Partial Stipulation and Agreements, which approved several agreements including the July 30 Stipulation.

3. On November 10, Spire Missouri, Inc. filed tariffs purportedly in compliance with the Commission’s Order. On November 12, the Commission issued an order directing that responses to the November 10 tariffs be filed no later than November 19.

4. With respect to the provisions for “Large Volume Transportation Service,” the November 10 tariffs are demonstrably not in compliance with the July 30 Stipulation and the Commission’s order approving it. Sheet 10.12 in the November 10 tariff filing includes the following:

NET MONTHLY BILL

The bill for each billing period shall be the sum of the Customer Charge, the Delivery Charge, the Contract Demand Charge, and the EGM Charge. Service hereunder is subject to the Purchased Gas Cost Adjustment (PGA) schedule in Sheet 11, the Infrastructure System Replacement Surcharge (ISRS) in Sheet 12, the Tax Adjustment (TA) schedule in Sheet 14 and other provisions as hereinafter described.

Rate

Fixed Monthly Charge: \$1380.27 per month

Volumetric Delivery Charge:

For all gas delivered during the billing months of November through March:  
\$0.07184 per Ccf for the first 36,000 Ccfs delivered, plus  
\$0.05604 per Ccf for all additional gas delivered.

For all gas delivered during the billing months of April through October:  
\$0.04484 per Ccf for the first 36,000 Ccfs delivered, plus  
\$0.02971 per Ccf for all additional gas delivered.

5. According to the July 30 Stipulation as approved by the Commission, that language on Sheet 10.12 should have been the same as the language that currently appears on Spire West Large Volume rate schedules pertaining to transportation service (except for a change to the Fixed Monthly Charge). The currently effective rate schedule pertaining to transportation service is found at P.S.C MO. No. 8 Sheet 5.3 and includes the following:

NET MONTHLY BILL

The bill for each billing period shall be the sum of the Customer Charge, the Delivery Charge, the Contract Demand Charge, and the EGM Charge. Service hereunder is subject to the Purchased Gas Cost Adjustment (PGA) schedule, the Infrastructure System Replacement Surcharge (ISRS), the Tax Adjustment (TA) schedule and other provisions as hereinafter described.

Rate

Fixed Monthly Charge: \$1095.27 per month

Volumetric Delivery Charge:

For all gas delivered during the billing months of November through March:

\$0.05512 per Ccf for the first 30,000 Ccfs delivered, plus

\$0.04300 per Ccf for all additional gas delivered.

For all gas delivered during the billing months of April through October:

\$0.03441 per Ccf for the first 30,000 Ccfs delivered, plus

\$0.02280 per Ccf for all additional gas delivered.

6. Comparing the provisions noted in paragraph 4 above to those in paragraph 5 above, it is readily apparent that the November 10 tariff filing fails to: 1) keep the rates of the Spire West Large Volume rate schedules pertaining to transportation service unchanged; and 2) fails to set the Fixed Monthly Charge at \$1145.90. Both of these are required by the Commission's order approving the July 30 Stipulation.

7. Furthermore, as noted in paragraph 4 above, the November 10 tariff filing at Sheet 10.12 purports to subject transportation customers to the Purchased Gas Adjustment ("Service hereunder is subject to the Purchased Gas Cost Adjustment (PGA) schedule in Sheet 11..."). The July 30 Stipulation provided that only the provisions in the currently effective Large Volume Service schedules pertaining to transportation service are to be moved to the new schedules for "Large Volume Transportation Service." By definition, transportation customers do not purchase gas and are not (nor should they be) subject to the Purchased Gas Adjustment and so the language in the currently effective Large Volume Service schedules concerning the applicability of the Purchased Gas Adjustment should not be moved to the new schedules for "Large Volume Transportation Service."

8. Because the November 10 tariffs do not comply with the Commission's order approving the July 30 Stipulation, they must be rejected.

WHEREFORE, Vicinity and MECG respectfully submit this response to the Commission's November 12 order and move that the Commission reject the tariffs filed by Spire on November 10.

Respectfully Submitted,

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all parties to this case on 19<sup>th</sup> day of November 2021 by electronic mail.

Lewis Mills