Exhibit No:	
Issue:	**Income Taxes**
Witness:	**Chuck J. Kuper**
Type of Exhibit:	**Direct Testimony**
Sponsoring Party:	**Spire Missouri Inc.**
Case Nos.:	**GO-2019-0115; GO-2019-0116**
Date Prepared:	**March 29, 2019**

SPIRE MISSOURI, INC.

File Nos. GO-2019-0115, GO-2019-0116

DIRECT TESTIMONY

OF

CHUCK J. KUPER

MARCH 2019

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DIRECT TESTIMONY OF CHUCK J. KUPER

Q. **PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Chuck J. Kuper and my business address is 700 Market St., St. Louis, Missouri, 63101.

Q. **WHAT IS YOUR PRESENT POSITION?**

A. I am employed by Spire Inc. as Director, Tax.

Q. **PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.**

A. I have held this position since I joined Spire in 2015. From January 2017 to July 2018, I was also responsible for External Financial Reporting. My current responsibilities include tax accounting, tax compliance, tax audits and tax planning.

Q. WHAT WAS YOUR PROFESSIONAL EXPERIENCE PRIOR TO ASSUMING YOUR CURRENT POSITION?

A. Prior to joining Spire, I was employed with Lumara Health, Inc. as their Senior Director, Reporting & Tax. I worked for Lumara Health from 2000 to 2015. When I first joined Lumara Health, I served as Director, Tax. I was promoted to Senior Director, Tax in 2007 and then added the Reporting function in 2013. Before joining Lumara Health, I worked for Hussmann Corporation as their International Tax Manager from 1998 to 2000. I spent approximately 11 years working with two national public accounting firms (Arthur Andersen & KPMG) prior to these roles.

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I hold a Master of Accountancy with a Tax emphasis from Southern Illinois University at Carbondale, Illinois which I received in 1987 and a Bachelor of Science in Accounting from Southern Illinois University at Carbondale, Illinois, which I received in 1986.

Q. **HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THIS COMMISSION?**

A. Yes, I filed testimony in Spire Missouri's last rate case proceedings, Case Nos. GR-2017-0215 and GR-2017-0216.

I. PURPOSE OF DIRECT TESTIMONY

Q. **WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of my testimony is to respond to Staff's March 15, 2019 recommendation in these cases to allow no amount for income taxes because the Company's current tax liability has been offset by certain tax deductions associated with the installation of ISRS facilities. As I will explain below, Staff's elimination of any allowance for income taxes should be rejected by the Commission for two primary reasons.

First, Staff's adjustment is inconsistent with the provisions of the ISRS Statute that specify how income taxes are to be calculated in the development of an ISRS revenue requirement. In effect, Staff's adjustment ignores the Statute's instruction to consider only tax rates, and instead looks behind those rates to apply specific deductions.

Second, Staff's adjustment results in a classic and impermissible "double dip" by taking deductions that are already reflected in rates.

II. BACKGROUND

Q. CAN YOU PLEASE PROVIDE THE COMMISSION WITH SOME HISTORICAL BACKGROUND ON THE TAX ISSUE RAISED BY STAFF IN ITS RECOMMENDATION?

A. Yes, this issue principally relates to tax deductions that the Company takes in connection with transferring services from old mains to new mains, as well as deductions taken by the Company pursuant to Section 263A of the Internal Revenue Code (the "263A Deductions") for administrative costs relating to its self-constructed assets, most notably those ISRS-related investments made to replace or relocate mains, services and other facilities. These costs are capitalized on the Company's books, but expensed and deducted for tax purposes.

Q. HOW DO THESE DEDUCTIONS IMPACT THE COMPANY?

A. By taking these deductions, the Company may be able to obtain a source of cash resulting from taxes it does not have to pay immediately which cash is, in turn, used to help finance the investments in plant the Company is making. To obtain those deductions, the Company expenses for tax purposes certain costs it capitalizes for book purposes associated with these investments, including the payroll and benefits of the employees (or the charges of their third-party contractors) who are performing the actual construction work, as well as the administrative overhead expenses of the engineers, corporate support services and other administrative functions and costs typically assigned to such work.

Q. HOW DOES THIS APPROACH TOWARDS CAPITALIZING AND DEDUCTING SUCH COSTS IMPACT CUSTOMERS?

A. The Company flows through the tax benefits of these deductions in its rate cases, so customers already enjoy lower rates due to lower tax expense.

Q. WHEN AND HOW DID THIS TAX ISSUE ARISE?

A. Shortly after the Commission promulgated its rules to implement the ISRS Statute, the Company made an ISRS filing in Case No. GO-2004-0443. In submitting its recommendation in that case, the Staff proposed to do what it is doing here: reduce the ISRS revenue requirement by the full value of the income tax expense associated with 263A deductions. The Company opposed Staff's treatment, but the parties ultimately reached an agreement under which they "split the difference" on the value of the issue for ISRS purposes on the condition that the parties would expedite implementation of the Company's ISRS filings. That agreement was approved and recognized in both ISRS and rate case proceedings until very recently. Over the past several years, however, the Company has not received the benefit of expedited ISRS filings, primarily because OPC has opposed one or more elements of the Company's filing and requested a hearing, thereby necessitating the use of the entire ISRS period. As a result, the issue is now being presented to the Commission for its decision on the merits. For the reasons discussed below, the Company respectfully submits that the Commission should approve the Company's approach that includes taxes at current rates, as prescribed by the ISRS Statute, and deny Staff's proposal that conflicts with the ISRS Statute and double counts tax deductions.

III. INCONSISTENCY WITH ISRS STATUTE

Q. WHAT DOES THE ISRS STATUTE PROVIDE IN TERMS OF HOW AN ISRS REVENUE REQUIREMENT IS TO BE DETERMINED?

A. Section 393.1009 states that the ISRS mechanism is designed to provide "appropriate pre-tax revenues" which is further defined as:

"the revenues necessary to produce net operating income equal to:

> (a) The gas corporation's weighted cost of capital multiplied by the net original cost of eligible infrastructure system replacements, including recognition of accumulated deferred income taxes and accumulated depreciation associated with eligible infrastructure system replacements which are included in a currently effective ISRS; and
>
> (b) Recover state, federal, and local income or excise taxes applicable to such income; and
>
> (c) Recover all other ISRS costs."

This definition of "appropriate pre-tax revenue" is further refined by Section 393.1015(4), which states in part,

> "4. In determining the appropriate pretax revenue, the commission shall consider <u>only</u> the following factors:
>
> (1) The current state, federal, and local income tax or excise *rates*;" (*emphasis added*)

Q. HOW ARE "ALL OTHER ISRS COSTS" DEFINED?

A. According to the ISRS Rule passed by the Commission, "other ISRS costs" are defined as the:

> "annual depreciation expenses, and property taxes that will be due within twelve (12) months of the ISRS filing on the total cost of eligible infrastructure system replacements less annual depreciation expense and property taxes on any related facility retirements."

Q. IN WHAT WAY DOES THE STAFF'S PROPOSED ADJUSTMENT DEVIATE FROM THESE STATUTORY PROVISIONS AND THE COMMISSION'S OWN RULES?

A. For the ISRS investments at issue in these cases, the Staff has reflected in its calculation of ISRS revenues the "flow-through" tax treatment that is currently afforded to transfer of services and the book/tax capitalization differences resulting from the 263A Deductions (even though these items are fully reflected in rates already, as discussed below).

Specifically, the Staff has inappropriately applied this "flow-through" tax treatment as an offset to the income tax "gross-up" necessary to recover the "appropriate pre-tax revenue" and "net operating income" provided for in the ISRS Statutes and Rule.

Q. IS THE OFFSET RECOMMENDED BY THE STAFF RELATED TO THESE TWO ITEMS ADDRESSED IN OR CONTEMPLATED BY THE ISRS STATUTES OR RULE?

A. No. As previously noted, the only income tax-related items open for consideration are the "current state, federal, and local income tax or excise rates" applicable to the net operating income on ISRS-eligible property.

Q. PLEASE EXPLAIN.

A. The ISRS Statute and ISRS Rule states that the ISRS should: "[r]ecover state, federal, and local income or excise taxes applicable to such income ..." By using the term "recover" this language clearly contemplates that there would be a positive tax amount associated with the income calculated pursuant to the preceding paragraph (a) of the Statute. This is further buttressed by another provision of the Statute, namely Section 393.1015(4)(1). As previously noted, that Section states that in determining ISRS revenues, the ***only*** factor that the Commission is to consider in terms of income taxes, is the "... current state, federal, and local income tax or excise ***rates;"*** (emphasis supplied). When considered together, these provisions establish a very straightforward and simple methodology for determining the income tax component of an ISRS filing, i.e. that component is determined by applying the state, federal and local income tax "rates" to the income amount calculated under Section 393.1009(1)(a).

Q. IS THERE ANYTHING IN THIS LANGUAGE TO INDICATE THAT TAX

DEDUCTIONS ASSOCIATED WITH PARTICULAR ISRS INVESTMENTS MAY BE CONSIDERED BY THE COMMISSION?

A. No, there is absolutely nothing in the language of these provisions to suggest, as the Staff has, that the Commission may go beyond this straightforward calculation and also examine issues such as the level of tax deductions associated with an ISRS investment. In fact, it indicates just the opposite by limiting the Commission to a consideration of tax rates. Staff's own Memorandum that was submitted when this issue was first raised by Staff in 2004 explicitly recognized the absence of language authorizing such a consideration when it attempted to rephrase the language of the ISRS Statute to accommodate Staff's proposed method for calculating taxes. As set forth at page 4 of its April 26, 2004 Memorandum submitted in Case No. GO-2004-0443, Staff stated that the ISRS should "recover state, federal, and local income or excise taxes applicable to such income **<u>(including all applicable tax deductions)"</u>** (emphasis supplied). Staff may indeed have believed that the computation of ISRS revenues should include a consideration of "all applicable tax deductions." However, the parenthetical language necessary to authorize such a consideration exists only on page 4 of Staff's Memorandum. It does ***not*** exist, however, in either the ISRS Statute or the ISRS Rule. Staff’s language demonstrates the difference between what the ISRS Statute actually says and what it would have to say to authorize Staff's proposed method for calculating taxes. Simply put, if the legislature had wanted tax deductions to be considered and flowed-through in the calculation of ISRS revenues, it would have incorporated language to that effect into the ISRS Statute. It did not. Instead, in requiring the Commission to process these cases in 120 days, the legislature specifically limited the matters to be considered by the Commission. With respect to taxes, the

Commission may only consider tax rates; it is not authorized to grapple with tax deductions.

Q. ARE THERE ANY OTHER REASONS WHY YOU BELIEVE THE FLOW-THROUGH OF TAX DEDUCTIONS IS NOT CONTEMPLATED BY THE ISRS STATUTE?

A. Yes. Where the ISRS Statute wishes to have a particular revenue or expense item considered in the calculation of ISRS revenues, it describes those items using technical terms that have been long-established and widely-recognized in the regulatory arena. For example, the ISRS Statute uses such terms as "accumulated deferred income taxes" and "accumulated depreciation" in describing the items that are to be considered when calculating ISRS revenues. Each of these technical terms has a very specific meaning in the ratemaking process and their inclusion in the ISRS Statute demonstrates the pains that the legislature took to describe exactly how the Commission was to calculate ISRS revenues and what items would be considered in that calculation. In much the same way, the term "flow-through" is also a technical term that has a very specific meaning in the regulatory process when it comes to calculating taxes. Indeed, I understand that the term has long been used in numerous Commission cases to describe the very kind of tax treatment that Staff is proposing in this case. The fact that this technical term, unlike the others described above, is nowhere to be found in the ISRS Statute is another fact indicating that Staff's proposed tax treatment was not contemplated by the Statute and, indeed, is precluded by it.

IV. DOUBLE COUNTING

Q. ARE THE LANGUAGE OF THE ISRS STATUTE AND RULE THE ONLY REASONS WHY THE COMPANY BELIEVES THAT THE STAFF'S PROPOSED TAX TREATMENT IS INAPPROPRIATE?

A. No. This issue must be decided based on what the ISRS Statute says, no matter what a party's individual views of the Statute may be. That said, however, it is important for the Commission to recognize that Staff's proposed tax treatment is also fundamentally unfair in that it seeks to double count the tax deductions associated with ISRS projects. An annualized level of current tax deductions associated with the Company's investments in ISRS projects is already reflected in the Company's rates, and reflecting an additional level of deductions, as Staff has proposed to do, amounts to a classic "double dip".

Q. CAN YOU IDENTIFY WHAT AMOUNTS ASSOCIATED WITH THE 263A DEDUCTIONS WERE FLOWED THROUGH IN THE COMPANY'S LAST RATE CASES?

A. Yes, Schedule CJK-1, which is attached to my direct testimony and incorporated herein for all purposes, contains the relevant Staff tax schedules from the Company's last rate cases. As shown by Staff's tax schedules, the value of 263A Deductions have reduced income for Spire Missouri East on line 17 by $16,196,036, and for Spire Missouri West on line 12 by $10,850,002. It is important to note that 263A Deductions are one-time deductions that occur each year for the assets that were constructed that year. Once the asset is "expensed" for tax purposes, it is, in effect, fully depreciated and cannot be expensed or depreciated again. Since the revenue requirement in the rate cases reflect a total of $27 million in *ongoing annualized allowances* for such deductions, the customer is already receiving the full benefit of annualized 263A Deductions each year. By trying to take the value of the 263A Deductions again in these ISRS cases, the Staff is double counting the value of these deductions. Stated another way, Spire has already given customers the benefits of these deductions and should not be made to pay them twice.

Q. **HAS THE STAFF PREVIOUSLY RECOGNIZED THAT IT IS CONTRARY TO THIS ISRS STATUTE AS WELL AS GOOD REGULATORY POLICY TO PERMIT A DOUBLE RECOGNITION OF AN ITEM THAT IS ALREADY EMBEDDED IN RATES?**

A. Yes. For example, the Staff has previously raised this very point in arguing why the Commission should not permit Missouri American Water Company ("MAWC") to recover its net cost of removal in its ISRS filing. Specifically, the Staff has argued that it is inappropriate because there was already an allowance for removal costs embedded in MAWC's rates, and recognition of such costs in the utility's ISRS filing would therefore result in a double-recovery. In addition to arguing that such a result was by its very nature inappropriate, the Staff also contended that such a double-recovery was never contemplated or sanctioned by the ISRS Statute. The very same considerations are equally applicable to what Staff has attempted to do in this case with its proposed tax treatment of 263A Deductions. For the very reasons that the Staff was right in opposing a double recovery of removal costs in MAWC's ISRS case, it is wrong for seeking a double recognition of these tax benefits in this case. The Commission should be consistent, however, by rejecting Staff's proposed tax treatment in this case just as it rejected MAWC's treatment of cost of removal in that case.

Q. **DOES THIS COMPLETE YOUR DIRECT TESTIMONY?**

A. Yes, it does.

Laclede Gas Company
Case No. GR-2017-0215
Test Year Ending 12-31-2016
True-Up through 9-30-2017
Income Tax Calculation

Line Number	A Description	B Percentage Rate	C Test Year	D 7.20% Return	E 7.20% Return	F 7.20% Return
1	TOTAL NET INCOME BEFORE TAXES		$84,915,445	$102,946,990	$102,946,990	$102,946,990
2	ADD TO NET INCOME BEFORE TAXES					
3	Book Depreciation Expense		$51,063,580	$51,063,580	$51,063,580	$51,063,580
4	Uncertain Tax Position Adjustment		$1,152,392	$1,152,392	$1,152,392	$1,152,392
5	Other Non Operating Non-Deductible Expense		$0	$0	$0	$0
6	Other Non Misc. Non-Deductible Expenses		$69,769	$69,769	$69,769	$69,769
7	Meals & Entertainment		$261,087	$261,087	$261,087	$261,087
8	TOTAL ADD TO NET INCOME BEFORE TAXES		$52,546,828	$52,546,828	$52,546,828	$52,546,828
9	SUBT. FROM NET INC. BEFORE TAXES					
10	Interest Expense calculated at the Rate of	1.8900%	$23,068,942	$23,068,942	$23,068,942	$23,068,942
11	Tax Straight-Line Depreciation		$51,063,580	$51,063,580	$51,063,580	$51,063,580
12	MACRS and Bonus Depreciation in Excess of Book		$14,415,797	$14,415,797	$14,415,797	$14,415,797
13	Life Insurance Proceeds		$0	$0	$0	$0
14	Nontaxable Insurance - Cash Surrender Value		$0	$0	$0	$0
15	Admin & General Nondeductible		$1,272,903	$1,272,903	$1,272,903	$1,272,903
16	ESOP		$3,773,840	$3,773,840	$3,773,840	$3,773,840
17	Depreciation 263A		$16,196,036	$16,196,036	$16,196,036	$16,196,036
18	TOTAL SUBT. FROM NET INC. BEFORE TAXES		$109,791,098	$109,791,098	$109,791,098	$109,791,098
19	NET TAXABLE INCOME		$27,671,175	$45,702,720	$45,702,720	$45,702,720
20	PROVISION FOR FED. INCOME TAX					
21	Net Taxable Inc. - Fed. Inc. Tax		$27,671,175	$45,702,720	$45,702,720	$45,702,720
22	Deduct Missouri Income Tax at the Rate of	100.000%	$1,558,081	$2,573,384	$2,573,384	$2,573,384
23	Deduct City Inc Tax - Fed. Inc. Tax		$0	$0	$0	$0
24	Federal Taxable Income - Fed. Inc. Tax		$26,113,094	$43,129,336	$43,129,336	$43,129,336
25	Federal Income Tax at the Rate of	21.000%	$5,483,750	$9,057,161	$9,057,161	$9,057,161
26	Subtract Federal Income Tax Credits					
27	Net Federal Income Tax		$5,483,750	$9,057,161	$9,057,161	$9,057,161
28	PROVISION FOR MO. INCOME TAX					
29	Net Taxable Income - MO. Inc. Tax		$27,671,175	$45,702,720	$45,702,720	$45,702,720
30	Deduct Federal Income Tax at the Rate of	50.000%	$2,741,875	$4,528,581	$4,528,581	$4,528,581
31	Deduct City Income Tax - MO. Inc. Tax		$0	$0	$0	$0
32	Missouri Taxable Income - MO. Inc. Tax		$24,929,300	$41,174,139	$41,174,139	$41,174,139
33	Subtract Missouri Income Tax Credits					
34	Missouri Income Tax at the Rate of	6.250%	$1,558,081	$2,573,384	$2,573,384	$2,573,384
35	PROVISION FOR CITY INCOME TAX					
36	Net Taxable Income - City Inc. Tax		$27,671,175	$45,702,720	$45,702,720	$45,702,720
37	Deduct Federal Income Tax - City Inc. Tax		$5,483,750	$9,057,161	$9,057,161	$9,057,161
38	Deduct Missouri Income Tax - City Inc. Tax		$1,558,081	$2,573,384	$2,573,384	$2,573,384
39	City Taxable Income		$20,629,344	$34,072,175	$34,072,175	$34,072,175
40	Subtract City Income Tax Credits					
41	City Income Tax at the Rate of	0.000%	$0	$0	$0	$0
42	SUMMARY OF CURRENT INCOME TAX					
43	Federal Income Tax		$5,483,750	$9,057,161	$9,057,161	$9,057,161
44	State Income Tax		$1,558,081	$2,573,384	$2,573,384	$2,573,384
45	City Income Tax		$0	$0	$0	$0
46	TOTAL SUMMARY OF CURRENT INCOME TAX		$7,041,831	$11,630,545	$11,630,545	$11,630,545
47	DEFERRED INCOME TAXES					
48	Deferred Income Taxes - Def. Inc. Tax.		$3,668,575	$3,668,575	$3,668,575	$3,668,575
49	Amortization of Deferred ITC		-$209,400	-$209,400	-$209,400	-$209,400
50	TOTAL DEFERRED INCOME TAXES		$3,459,175	$3,459,175	$3,459,175	$3,459,175
51	TOTAL INCOME TAX		$10,501,006	$15,089,720	$15,089,720	$15,089,720

Missouri Gas Energy
Case No. GR-2017-0216
Test Year Ending 12-31-2016
True-Up Period Ending 09-30-2017
Income Tax Calculation

Line Number	A Description	B Percentage Rate	C Test Year	D 7.20% Return	E 7.20% Return	F 7.20% Return
1	TOTAL NET INCOME BEFORE TAXES		$53,877,216	$69,077,788	$69,077,788	$69,077,788
2	ADD TO NET INCOME BEFORE TAXES					
3	Book Depreciation Expense		$32,913,067	$32,913,067	$32,913,067	$32,913,067
4	Meals and Entertainment		$69,121	$69,121	$69,121	$69,121
5	Miscellaneous Non-Deductible		$0	$0	$0	$0
6	FIN 48 Uncertain Tax Positions		$49,067	$49,067	$49,067	$49,067
7	TOTAL ADD TO NET INCOME BEFORE TAXES		$33,031,255	$33,031,255	$33,031,255	$33,031,255
8	SUBT. FROM NET INC. BEFORE TAXES					
9	Interest Expense calculated at the Rate of	1.8900%	$15,258,862	$15,258,862	$15,258,862	$15,258,862
10	Tax Straight-Line Depreciation		$32,913,067	$32,913,067	$32,913,067	$32,913,067
11	MACRS and Bonus Depreciation in Excess of Book		$40,871,903	$40,871,903	$40,871,903	$40,871,903
12	Depreciation 263A		$10,850,002	$10,850,002	$10,850,002	$10,850,002
13	TOTAL SUBT. FROM NET INC. BEFORE TAXES		$99,893,834	$99,893,834	$99,893,834	$99,893,834
14	NET TAXABLE INCOME		-$12,985,363	$2,215,209	$2,215,209	$2,215,209
15	PROVISION FOR FED. INCOME TAX					
16	Net Taxable Inc. - Fed. Inc. Tax		-$12,985,363	$2,215,209	$2,215,209	$2,215,209
17	Deduct Missouri Income Tax at the Rate of	100.000%	-$731,167	$124,732	$124,732	$124,732
18	Deduct City Inc Tax - Fed. Inc. Tax		$0	$0	$0	$0
19	Federal Taxable Income - Fed. Inc. Tax		-$12,254,196	$2,090,477	$2,090,477	$2,090,477
20	Federal Income Tax at the Rate of	21.000%	-$2,573,381	$439,000	$439,000	$439,000
21	Subtract Federal Income Tax Credits					
22	Net Federal Income Tax		-$2,573,381	$439,000	$439,000	$439,000
23	PROVISION FOR MO. INCOME TAX					
24	Net Taxable Income - MO. Inc. Tax		-$12,985,363	$2,215,209	$2,215,209	$2,215,209
25	Deduct Federal Income Tax at the Rate of	50.000%	-$1,286,691	$219,500	$219,500	$219,500
26	Deduct City Income Tax - MO. Inc. Tax		$0	$0	$0	$0
27	Missouri Taxable Income - MO. Inc. Tax		-$11,698,672	$1,995,709	$1,995,709	$1,995,709
28	Subtract Missouri Income Tax Credits					
29	Missouri Income Tax at the Rate of	6.250%	-$731,167	$124,732	$124,732	$124,732
30	PROVISION FOR CITY INCOME TAX					
31	Net Taxable Income - City Inc. Tax		-$12,985,363	$2,215,209	$2,215,209	$2,215,209
32	Deduct Federal Income Tax - City Inc. Tax		-$2,573,381	$439,000	$439,000	$439,000
33	Deduct Missouri Income Tax - City Inc. Tax		-$731,167	$124,732	$124,732	$124,732
34	City Taxable Income		-$9,680,815	$1,651,477	$1,651,477	$1,651,477
35	Subtract City Income Tax Credits					
36	City Income Tax at the Rate of	0.000%	$0	$0	$0	$0
37	SUMMARY OF CURRENT INCOME TAX					
38	Federal Income Tax		-$2,573,381	$439,000	$439,000	$439,000
39	State Income Tax		-$731,167	$124,732	$124,732	$124,732
40	City Income Tax		$0	$0	$0	$0
41	TOTAL SUMMARY OF CURRENT INCOME TAX		-$3,304,548	$563,732	$563,732	$563,732
42	DEFERRED INCOME TAXES					
43	Deferred Income Taxes - Def. Inc. Tax.		$10,401,204	$10,401,204	$10,401,204	$10,401,204
44	Amortization of Deferred ITC		$0	$0	$0	$0
45	TOTAL DEFERRED INCOME TAXES		$10,401,204	$10,401,204	$10,401,204	$10,401,204
46	TOTAL INCOME TAX		$7,096,656	$10,964,936	$10,964,936	$10,964,936

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Spire Missouri Inc. to Change its Infrastructure System Replacement Surcharge in its Spire Missouri East Service Territory	)	**File No. GO-2019-0115**
In the Matter of the Application of Spire Missouri Inc. to Change its Infrastructure System Replacement Surcharge in its Spire Missouri West Service Territory	)	**File No. GO-2019-0116**

AFFIDAVIT

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

Chuck J. Kuper, of lawful age, being first duly sworn, deposes and states:

1. My name is Chuck J. Kuper. I am Director, Tax for Spire Missouri Inc. My business address is 700 Market St., St Louis, Missouri, 63101.

2. Attached hereto and made a part hereof for all purposes is my direct testimony on behalf of Spire Missouri Inc.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Chuck J. Kuper
Chuck J. Kuper

Subscribed and sworn to before me this 29th day of March 2019.

LANA K SCHNEIDER
Notary Public - Notary Seal
STATE OF MISSOURI
Commissioned for Saint Louis City
My Commission Expires: October 29, 2022
Commission # 18005093

Lana Schneider
Notary Public