

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

In the Matter of Spire Missouri Inc.'s d/b/a Spire)
2019/2020 Purchased Gas/Actual Cost Adjustment)
Filing for its Spire Missouri East Operating Unit) **File No. GR-2020-0121**

**STAFF RECOMMENDATION FOR SPIRE EAST'S
2018-2019 ACTUAL COST ADJUSTMENT (ACA) PERIOD**

COMES NOW the Staff of the Missouri Public Service Commission and for its *Recommendation For Spire East's 2018-2019 Actual Cost Adjustment (ACA) Period*, states as follows:

1. On October 31, 2019, Spire East filed its Actual Cost Adjustment (ACA) for the 2018-2019 ACA period to revise the ACA rates based on the Company's calculation of its ACA balances.

2. The purchased gas adjustment (PGA) portion of this filing was for inclusion of estimated gas costs that will apply in the 2019 – 2020 ACA period. The ACA portion of the Company's filing was done to reconcile its actual gas costs for the 2018 -2019 ACA period. In past cases, such as Case No. GR-2017-0299, the Company avoided such "styling" confusion by styling the case consistent with the ACA period under review. Here, in this matter, the Company styled the above-captioned case using the PGA period of 2019-2020 instead of styling the case for filing and setting its 2018-2019 ACA balances. Staff's Report addresses the gas supply portfolio and gas supply decisions made by Spire East in its 2018-2019 ACA period.

3. The Commission's Procurement Analysis Department ("Staff") has reviewed the Company's ACA filing. Staff's review included an analysis of billed revenues and actual gas costs for the ACA period October 1, 2018, through September 30, 2019. Staff conducted a reliability analysis for Spire East, including a

review of its estimate of customers’ needs on a peak day (peak day requirements and the capacity levels to meet those requirements), peak day reserve margin and its rationale, and a review of gas supply plans for various weather conditions. Staff also reviewed Spire East’s gas purchasing practices to determine the prudence of the Company’s purchasing and operating decisions.

4. Based on Staff’s review and analysis of Spire East’s gas portfolio for its 2018-2019 ACA period, Staff has proposed no adjustments to Spire East’s September 30, 2019, ACA account balances as shown in the table in the Recommendations section of Staff’s Memorandum, attached as “Appendix A” and incorporated herein.

WHEREFORE, Staff respectfully requests that the Commission (1) issue an order directing the Company to establish the ACA account balances as shown in the table below to reflect the under or (over)-recovery balance as of September 30, 2019; and (2) issue an order requiring Spire East to respond to all of the recommendations contained in Staff’s Memorandum within 45 days.

	Firm Sales non-LVTSS	Firm Sales LVTSS	Interruptible Sales	LP Sales	Firm Transportation	Basic Transportation	Vehicular Fuel
ACA Balance per Filing	\$ (4,828,985)	\$ 294,691	\$ 21,126	\$ 5,691	\$ 677,032	\$ 241	\$ 586,640
Staff Adjustments	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Staff Recommended ACA Balance	\$ (4,828,985)	\$ 294,691	\$ 21,126	\$ 5,691	\$ 677,032	\$ 241	\$ 586,640

Respectfully submitted,
/s/ Robert S. Berlin
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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 all counsel of record on this 15th day of December 2020.

/s/ Robert S. Berlin