

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

In the Matter of Spire Missouri Inc's d/b/a) **File No. GR-2020-0122**
Spire 2019/2020 Purchased Gas/Actual)
Cost Adjustment filing for its Spire Missouri)
East and Spire Missouri West Operating Units)

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

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

1. On October 31, 2019, Spire West (“Company”) 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 Spire West 2019 – 2020 ACA period. (See Staff’s Report regarding Spire East’s ACA in Case No. GR-2020-0121). The ACA portion of Spire West’s filing in this case was done to reconcile its actual gas costs for the 2018-2019 ACA period. In past cases, such as Case No. GR-2017-0300, 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 West 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 West, 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 West’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 West’s gas portfolio for its 2018-2019 ACA period, Staff has proposed no adjustments to Spire West’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 Spire West to establish the ACA account balances as shown in the table below to reflect the (over)-recovery balance as of September 30, 2019; and (2) issue an order requiring Spire West to respond to all of the recommendation contained in Staff’s Memorandum within 45 days.

Account	9-30-19 Ending Balance per Spire West Filing	Current Period Proposed Adjustment	9-30-19 Staff Recommended Ending Balance
ACA Balance	\$ (21,750,322.69)	\$ 0	\$ (21,750,322.69)

Respectfully submitted,

/s/ Bob 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 this 15th day of December 2020.

/s/ Robert S. Berlin