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

In the Matter of Spire Missouri Inc's Motion for	)	
Expedited Treatment of its COVID-19 Residential	)	File No.
Assistance Program Tariff Filing	)	

## SPIRE MISSOURI INC.'S MOTION FOR EXPEDITED TREATMENT OF ITS COVID-19 RESIDENTIAL ASSISTANCE PROGRAM TARIFF FILING

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of its operating units, Spire Missouri East ("Spire East") and Spire Missouri West ("Spire West") and, pursuant to Commission Rules 20 CSR 4240-2.065(2) and 20 CSR 4240-3.080(14) files this Motion for Expedited Treatment of its COVID-19 Residential Assistance Program Tariff Filing consistent with the terms set forth in the Commission approved unanimous stipulation agreement reached in Case No. GU-2020-0376. In support thereof, Spire Missouri respectfully states as follows:

1. On May 18, 2020, Spire Missouri filed an application with the Commission for an accounting authority order for costs related to the COVID-19 pandemic. On September 15, 2020, Spire Missouri, along with the Staff of the Missouri Public Service Commission, the Office of Public Counsel, Midwest Energy Consumers Group, Missouri Industrial Energy Consumers, National Housing Trust and Renew Missouri, filed an Amended Unanimous Stipulation and Agreement that included the implementation of a COVID-19 Arrearage Management Program. The program is designed to assist those Spire customers who have either lost their jobs, been furloughed or lost income since Mar 1, 2020. Under the program, eligible customers will receive \$100 upon enrollment, and in addition, the Company will contribute a dollar for dollar match of up to \$300 towards a customer's past due bills. The agreement states that the program is to begin October 21, 2020 and end March 31, 2021.

2. The Commission issued an order in Case No. GU-2020-0376 approving the

Amended Unanimous Stipulation and Agreement on October 21, 2020.

3. While the health and economic impacts of the COVID-19 pandemic were seen in

Missouri as early as March of this year, Spire customers are still struggling. As we are nearing

winter heating season, approval and implementation of the Parties' agreed upon COVID-19

customer program becomes even more critical. Many customer arrearage amounts are already up to

several hundred dollars higher per account than what the Company has historically seen. Given this

demonstrated need for economic relief and the need to implement on a timely basis, the Company

submits that there is good cause to approve its tariff filing on an expedited basis and respectfully

requests that the Commission approve its tariff filing filed on this same date by no later than October

28, 2020 so the tariff may go into effect by November 7, 2020.

4. Spire Missouri submits that harm will be avoided by expedited approval of the

application by permitting the Company's qualified residential customers access to energy assistance

funding on a timely basis. At the same time, there will be no negative impact on other customers

or the general public if the Commission grants such relief. For all of these reasons, Spire Missouri

submits that there is good cause for the Commission to approve its motion for expedited treatment

and companion tariff sheets no later than October 28, 2020.

5. This pleading was filed as soon as it could have been following the Commission's

approval of the Unanimous Stipulation and Agreement in Case No. GU-2020-0376 on this same

date.

WHEREFORE, for the foregoing reasons, Spire Missouri, Inc. respectfully requests that

the Commission grant its motion for expedited treatment as described herein.

Respectfully submitted,

<u> |s/Goldie T. Bockstruck</u>

Goldie T. Bockstruck #58759

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ATTORNEY FOR SPIRE MISSOURI INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing pleading has been duly served upon the General Counsel of the Staff and on the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 30<sup>th</sup> day of September, 2020.

/s/ Goldie T. Bockstruck