## 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	)	File No. GO-2019-0356
Replacement Surcharge in its Spire Missouri East	)	
Service Territory	)	
In the Matter of the Application of Spire Missouri	)	
Inc. to Change its Infrastructure System	)	File No. GO-2019-0357
Replacement Surcharge in its Spire Missouri West	)	
Service Territory	)	

# SPIRE MISSOURI INC'S MOTION FOR EXPEDITED TREATMENT

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of itself and its two operating units, Spire Missouri East ("Spire East") and Spire Missouri West ("Spire West") and, pursuant to Rule 20 CSR 4240-2.080 (14) submits this Motion for Expedited Treatment to permit the Revised Tariff Sheets filed by the Company on this date to become effective on or before November 12, 2019, or such earlier date as may be practicable. In support thereof, the Company states as follows:

1. On October 30, 2019, the Commission issued its Report and Order in the above-captioned cases in which it rejected the tariffs originally filed by Spire Missouri in these cases and authorized the Company to file new revised tariff sheets sufficient to recover ISRS revenues in the amount of \$ \$4,763,180 for its Spire East service territory and \$ \$3,996,543 for its Spire West service territory. Consistent with the statutory deadline set forth in the ISRS Statute (*see* Sections 393.1009 RSMo. to 393.1015 RSMo.) for processing ISRS applications, the Commission made its Report and Order effective on November 12, 2019.

- 2. In compliance with the Commission's Report and Order, the Company has contemporaneously filed with this Motion for Expedited Treatment, new tariffs to recover the ISRS revenues authorized by the Commission. The new tariffs also incorporate the rate design that the Companies believe is the rate design that would be recommended by the Commission Staff consistent with the requirements of the ISRS Statute.
- 3. The purpose of this Motion for Expedited Treatment is to enable the Revised Tariff Sheets filed on this date to become effective on November 12, 2019 (or sooner if practicable), which is the deadline for processing these ISRS cases under the ISRS Statute (*see* subdivision (3) of Section 393.1015). In further support of this request, Spire Missouri would note that the Revised Tariff Sheets reflect the Staff's revenue requirement recommendations, as adjusted to reflect the effect of the Income Tax Settlement approved by the Commission in its October 30, 2019 Report and Order. Since Staff's revenue requirement recommendations, which have now been approved by the Commission, were submitted on October 29<sup>th</sup> without objection by any party, approval of a November 12, 2019 effective date will have afforded parties 13 days to register any complaint regarding the revenue requirement reflected in the Revised Tariff Sheets and 12 days to register any concerns regarding the rate design reflected in the Revised Tariff Sheets. The Company believes this is more than sufficient under the law, especially given the very abbreviated nature of the several tariff sheets that require review by the parties.
- 4. Spire Missouri submits that harm will be avoided by expedited approval of the revised tariff sheets since it will permit the new ISRS revenues authorized by the Commission in these cases to become effective within the 120-day time period mandated by the ISRS Statute. 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 the proposed tariffs to become effective on November 12, 2019.

5. This pleading was filed as soon as it could have been following the Company's preparation and filing of Revised Tariffs implementing the terms of the Report and Order issued by the Commission in these cases on October 30, 2019.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that Commission consider and grant this Motion for Expedited Treatment and approve the Revised Tariff Sheets to become effective on November 12, 2019, or such earlier date as may be practicable.

Respectfully submitted,

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

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing Brief of Spire Missouri was served to all counsel of record on this 30<sup>th</sup> day of October, 2019 by hand-delivery, fax, electronic or regular mail.

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