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

In the Matter of the Application of Spire Missouri<br/>Inc. to Change its Infrastructure System)File No. GO-2019-0015Replacement Surcharge in its Spire Missouri<br/>East Service Territory)File No. GO-2019-0015In the Matter of the Application of Spire Missouri<br/>Inc. to Change its Infrastructure System<br/>Replacement Surcharge in its Spire Missouri<br/>West Service Territory)File No. GO-2019-0015

# <u>SPIRE MISSOURI INC'S</u> 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 4 CSR 240-2.080 (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 May 14, 2019, or such earlier date as may be practicable. In support thereof, the Company states as follows:

1. On May 3, 2019, the Commission issued its Report and Order in the abovecaptioned 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 \$6,425,514 for its Spire East service territory and \$6,782,560 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 May 14, 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 Company has discussed this proposed filing with Staff and, subject to Staff's official recommendation, believes the new tariffs reflect the appropriate rate design and determinants that were agreed to in those proceedings and are 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 May 14, 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).

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 May 14, 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 May 3, 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 May 14, 2019, or such earlier date as may be practicable.

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Respectfully submitted,

SPIRE MISSOURI INC.

### <u>/s/ Michael C. Pendergast</u>#31763

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## <u>/s/ Rick Zucker</u>#49211

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# **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on Staff and the Office of the Public Counsel, on this 6th day of May, 2019 by hand-delivery, fax, electronic mail or by regular mail, postage prepaid.

<u>/s/ Rick Zucker</u>