

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

In the Matter of Spire Missouri Inc. d/b/a)	
Spire's Verified Application to Renew)	Case No. GF-2018-0249
Its Financing Authority)	

OPC'S RESPONSE TO STAFF RECOMMENDATION

COMES NOW, the Office of the Public Counsel, and for *OPC's Response to Staff Recommendation*, states as follows:

On June 20, 2018, Spire Missouri, Inc. filed its *Verified Application of Spire Missouri, Inc. for Approval of Financing Authority and Motion to Schedule an Early Procedural Conference*.

On August 8, 2018, the Staff of the Missouri Public Service Commission filed its *Staff Recommendation*, which "recommends the Commission issue an order granting Spire Missouri the full amount of the financing authorization requested, subject to [the 11 conditions specifically enumerated by the Staff]."

The tenth recommendation of Staff provides:

"That nothing in the Commission's order shall be considered a finding by the Commission of the value of these transactions for rate making purposes, and that the Commission reserves the right to consider the rate making treatment to be afforded these financing transactions and their results in cost of capital, in any later proceeding." Staff Recommendation, Official Case File Memorandum, August, 8, 2018, Page 6 of 7 to Page 7 of 7.

The OPC responds by recommending to modify paragraph 10 to state, "That nothing in the Commission's order shall be considered a finding by the Commission of the value **or** **prudence** of these transactions for rate making purposes, and that the Commission reserves the

right to consider the rate making treatment to be afforded these financing transactions and their results in cost of capital, in any later proceeding.”

Subject to the OPC’s modification to the Staff’s tenth condition, the OPC agrees with and does not object to the *Staff Recommendation*.

WHEREFORE, the OPC requests the Commission to accept its response to the Staff’s recommendation and order any other relief the Commission deems just and reasonable.

Respectfully submitted,

/s/ Ryan Smith

Ryan D. Smith
Missouri Bar No. 66244
Senior Counsel

PO Box 2230
Jefferson City, MO 65102
P: (573) 751-4857
F: (573) 751-5562
E-mail: ryan.smith@ded.mo.gov

ATTORNEY FOR THE OFFICE
OF THE PUBLIC COUNSEL

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or by U.S. Mail, postage prepaid, on August 17, 2018 to all counsel of record.

/s/ Ryan D. Smith