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 Replacement Surcharge in its Spire Missouri East Service Territory))))	Case No. GO-2019-0115
In the Matter of the Application of Spire Missouri Inc. to Change its Infrastructure System Replacement Surcharge in its Spire Missouri West Service Territory))))	Case No. GO-2019-0116

THE MISSOURI OFFICE OF THE PUBLIC COUNSEL'S RESPONSE TO THE ORDER DIRECTING STAFF RECOMMENDATION AND SETTING TIME FOR RESPONSES

COMES NOW the Missouri Office of the Public Counsel ("the OPC") and for its *Response to the Order Directing Staff Recommendation and Setting Time for Responses* filed by the Public Service Commission ("the Commission"), states as follows:

1. On May 7, 2019, the Commission issued an *Order Directing Staff Recommendation and Setting Time for Responses*, which directed Staff to file a recommendation regarding the substitute tariffs filed by Spire Missouri Inc. ("Spire") in the above styled cases by 12:00 p.m. on May 9, 2019. This order also required the OPC to file any objections it had to these same tariffs by 12:00 p.m. May 10, 2019.

2. The OPC objects to the substitute tariffs filed by Spire on May 6, 2019, to the extent that these tariffs do not address the issues that the OPC intends to raise

in its motion for rehearing or reconsideration, which the OPC intends to file on or about May 13, 2019. In particular, the OPC's objections include, without limitation to other potential issues, the fact that: (1) these tariffs permit the recovery of money based on a calculation of Spire's revenue requirement that does not reflect a necessary reduction in net property taxes that will be owed on the plant additions that the Commission has found to be ISRS eligible, and (2) these tariffs permit the recovery of money related to the replacement of cast iron and bare steel pipes that are not worn out or in a deteriorated condition.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission accept this *Response to the Order Directing Staff Recommendation and Setting Time for Responses* and take such further action as necessary.

> Respectfully submitted, OFFICE OF THE PUBLIC COUNSEL

By: /s/ John Clizer John Clizer (#69043) Associate Counsel P.O. Box 2230 Jefferson City, MO 65102 Telephone: (573) 751-5324 Facsimile: (573) 751-5562 E-mail: john.clizer@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this tenth day of May, 2019.

/s/ John Clizer