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Witness: Michelle Antrainer
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GR-2021-0108

DIRECT TESTIMONY
OF MICHELLE ANTRAINER

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1 **DIRECT TESTIMONY OF MICHELLE ANTRAINER**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. Michelle Antrainer. My business address is 700 Market Street, St. Louis, MO 63101.

4 **Q. WHAT IS YOUR PRESENT POSITION?**

5 A. I am presently employed as Lead Regulatory Analyst at Spire Missouri Inc. (referred to
6 throughout as “Spire” and the “Company.”

7 **Q. PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND**
8 **BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.**

9 A. I have been in my present position since January 2020. As part of my duties, I am
10 responsible for the research, assessment, development, and implementation of Spire’s
11 rate/regulatory analysis.

12 **Q. PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL EXPERIENCE AT**
13 **SPIRE MISSOURI.**

14 A. I joined Spire Missouri Inc. (Laclede Gas) in 1993 as a corporate accountant. Since that
15 time, I worked in various positions within the Finance and Operations area of Spire along
16 with working on teams that implemented several IT software solutions.

17 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

18 A. I have a Bachelor of Science in Business Administration, with an emphasis in Accounting
19 from the University of Missouri – St. Louis.

20 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THIS COMMISSION?**

21 A. No.

22 **I. PURPOSE OF TESTIMONY**

23 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

1 A. The purpose of my testimony is to discuss Spire’s proposed changes to several tariffs
2 involving Miscellaneous Charges and to discuss Spire’s tariff pertaining to Rural
3 Expansion, the Growing Missouri Program.

4 **Q. PLEASE DISCUSS THE CHANGES TO TARIFFS REGARDING**
5 **MISCELLANEOUS CHARGES.**

6 A. Spire is proposing changes to three “miscellaneous charges” tariffs; **Sheet 16** (
7 Miscellaneous Charges); **Sheet 17** (Returned Payment Charge and Service and Meter
8 Relocation Charges); and **Sheet 18** (Meter Test Charge, Excess Flow Valve Charge, and
9 Service Initiation Charge.) Spire is also proposing a new tariff sheet, Sheet 9, related to
10 the Company’s implementation of the Growing Missouri Program.

11 **Q. WHAT ARE THE PRIMARY DRIVERS BEHIND THESE PROPOSED TARIFF**
12 **REVISIONS?**

13 A. Spire filed its last rate case in April 2017, in compliance with requirements of the Missouri
14 Infrastructure System Replacement Surcharge (“ISRS”) statute. That proceeding
15 ultimately resulted in a rate decrease for Spire, the Company’s last base rate increase was
16 in 2013. The modifications to the miscellaneous charges tariffs noted above are due to the
17 fact that these charges have not been revisited in some time—in some cases decades—and
18 no longer accurately reflect the actual costs to Spire to provide those specific services. The
19 proposed tariff revisions bring these charges in line with Spire’s actual costs to provide the
20 noted services

21 **Q. PLEASE EXPLAIN THE PROPOSED CHANGES TO SHEET 16.**

22 A. Sheet R-12 of Spire’s Rules and Regulations provide for circumstances under which a
23 customer’s service may be discontinued. If service is discontinued for any of these reasons,

1 charges must be paid by the customer prior to restoration of service. Sheet 16 proposes
2 increasing the reconnection charge for a residential customer from \$62.00 to \$95.00.
3 Service reconnection charges for an industrial customer will increase to \$95.00 or actual
4 Spire cost, whichever is greater.

5 **Q. PLEASE CONTINUE WITH YOUR DISCUSSION OF THE CHANGES TO**
6 **SHEET 16.**

7 A. Sheet 16 also proposes revisions to Spire's meter reading non-access charge. Spire's Rule
8 R-18 provides that if the Company has been unable to gain access for meter reading
9 purposes for nine months or more, and if the customer fails to provide access for meter
10 reading within 21 days after Spire's written request, Spire may assess a non-access charge
11 to that customer. Rule R-18 specifies that a maximum of three non-access charges may be
12 assessed to the customer in a twelve-month period, but the non-access charge will be
13 waived if the customer does not control access to the meter. The proposed revision to Sheet
14 16 increases the Meter Reading Non-Access Charge from \$10.00 to \$20.00.

15 **Q. ARE THERE ANY OTHER METER-RELATED CHARGES PROPOSED IN**
16 **SHEET 16?**

17 A. Yes. For residential customers who request removal of an automated meter reading device,
18 the company will make every effort to comply with the request until existing technology
19 becomes obsolete. For customers who choose this option, a one-time meter setup fee of
20 \$185 is proposed along with a \$40 monthly Non-Standard Meter Read charge.

21 **Q. ARE ANY OTHER CHANGES BEING PROPOSED TO SHEET 16?**

22 A. Yes, one other change is proposed. R-18 provides that when Spire makes a service trip for
23 the purpose of disconnecting service due to non-payment, and that customer pays Spire's

1 personnel at the customer’s premises to avoid the disconnection of service, a trip charge
2 may be assessed for recovery of the cost of personnel traveling to customer’s premises.
3 Spire proposes to increase the Collection Trip Charge from \$9.00 to \$15.00.

4 **Q. WHAT REVISIONS ARE PROPOSED FOR SHEET 17?**

5 A. Spire’s Rules and Regulation Sheet R-8 provides that a customer-requested change in the
6 location of the service line or meter may be performed by the Company in accordance with
7 the charges set forth on Sheet 17. The proposed revisions to Sheet 17 increase the charge
8 for a “residential outside relocation” of the meter from \$150.00 to \$200.00, increase the
9 charge for a “residential inside relocation” of the meter from \$100.00 to \$200.00, remove
10 charges for moving an inside meter to outside, and remove charges for a temporary
11 disconnection of the service line. The proposed revisions specify that there will be no
12 charge for moving an inside meter to an outside location contingent upon company
13 approval of meter placement meeting all company safety policies and practices. Further,
14 the proposed revisions simplify the base costs for relocation or extension of a service line
15 by changing the cost of such relocation or extension to \$150.00 from \$120.00 for a change
16 up to ten feet and eliminating the 10-foot incremental charges (e.g., 11-20 feet, 21-30 feet,
17 etc.) for relocations or extensions. Rather, the revisions propose that changes over ten feet
18 be charged at an additional \$8.00 per foot over ten feet.

19 **Q. WHAT CHANGES DOES SPIRE PROPOSE TO SHEET 18?**

20 A. As described in Sheet 18, if a customer requests that their meter be tested more than once
21 in a twelve-month period, a fee may be assessed for the additional testing (unless the meter
22 registration is proved to be inaccurate in excess of 2%). The first test at the request of the
23 customer is free of charge. The proposed revisions to meter test charges on Sheet 18 are

1 to increase the residential meter test fee to \$80.00 from \$75.00, and the commercial and
2 industrial meter test fee to \$205.00 from \$125.00.

3 An additional proposed change to Sheet 18 reflects the standardization of the service
4 initiation charge across all Spire Missouri's operating footprint. For all new Missouri
5 customers, the charge will be \$25 billed in equal installments over a four-month period.

6 **Q. ARE THERE ADDITIONAL PROPOSED CHANGES TO SHEET 18?**

7 A. Yes. In order to comply with the United States Department of Transportation regulation
8 49 CFR 192.383, Spire must install an excess flow valve ("EFV") for certain new or
9 replaced eligible gas service lines at no cost to the customer. A customer may also request
10 that an EFV be installed on an existing service line at their own expense. Accordingly,
11 Spire proposes to change the standard charge for EFV installation, as reflected in Sheet 18,
12 from \$1,200.00 to \$1,500.00, subject to the provisions of subsection B in Sheet 18.
13 Subsection B provides that Spire will provide an estimate of the actual cost of the EFV
14 installation prior to such installation to assess whether there is any variation between the
15 standard charge for EFV installation and the estimated charge.

16 **Q. IS SPIRE PROPOSING A NEW TARIFF IN THIS PROCEEDING?**

17 A. Yes. Spire is requesting approval for its Growing Missouri Program.

18 **Q. WHY DOES SPIRE NEED A GROWTH PROGRAM?**

19 A. Currently, expansion projects must meet a specified rate of return threshold in order to
20 qualify. Expansion into rural areas often do not pass the economic feasibility criteria for
21 the Company to extend service. This acts as a deterrent to industrial and commercial
22 development in areas (mainly rural) that could benefit from this growth.

1 The proposed Growing Missouri Program, Sheet No. 9, is designed to encourage industrial
2 development, rural growth expansion, and job creation by providing an incentive for Spire
3 to extend gas service to industrial or rural expansion projects that are otherwise not
4 economically feasible for the Company to fund.

5 **Q. WHAT ARE THE TERMS OF THE GROWING MISSOURI PROGRAM THAT**
6 **WILL ENHANCE SPIRE’S ABILITY TO INVEST IN ECONOMIC**
7 **DEVELOPMENT PROJECTS?**

8 A. In order to extend natural gas service for industrial and rural expansion projects not
9 otherwise economically feasible for the Company to fund, Spire proposes that it may
10 provide up to \$5,000,000 annually in funds towards strategic economic development
11 opportunities that may not otherwise come to fruition due to economic reasons.

12 **Q. CAN YOU PROVIDE AN EXAMPLE OF A POTENTIAL PROJECT THAT THIS**
13 **PROGRAM MIGHT TARGET?**

14 A. Yes. Over the past few years, Spire has received several requests to extend service in
15 Southwest Missouri to provide gas service to agricultural and poultry operations. Spire has
16 been contacted by and reached out to many more farmers, companies, and county
17 commissions to discuss the many benefits these stakeholders stand to receive from being
18 provided natural gas service. An extension of this nature, that under Spire’s standard rules
19 and regulations would not be deemed economically feasible would be a great example of
20 a project the Company is targeting with this program.

21

22

1 **Q. IS THE COMPANY PROPOSING AN OPTION IN THE EVENT THE**
2 **REQUESTED ALLOWANCE IS EXCEEDED?**

3 A. A Company investment greater than \$5,000,000 annually would require Commission
4 approval.

5 **Q. HOW WILL THESE CONTRIBUTIONS BE RECOVERED?**

6 A. At the time of Spire's next rate case, any investments made under this program will be
7 rolled into base rates similar to typical capital investments. This program provides is a way
8 for the Company to document strategic investments that may not initially appear
9 economically feasible but have the potential to create material economic benefits.

10 **Q. WHAT IS THE COMPANY PROPOSING FOR DOCUMENTATION AND**
11 **REPORTING RELATED TO THIS PROGRAM?**

12 A. For projects falling under this program, Spire will maintain detailed records of project
13 information and will provide reporting on an annual basis regarding investments made
14 under the program.

15 **Q. IS THERE A LIMIT TO THE SIZE OF AN INDIVIDUAL PROJECT UNDER THE**
16 **PROPOSED PROGRAM?**

17 A. In order to enable qualifying expansion projects, and to balance costs, the amount to be
18 invested on any one project pursuant to the Growing Missouri Program will not exceed the
19 total investment required to extend service to such project, less the economically feasible
20 portion of the investment as calculated by Spire under its Gas Facility Extension Policy.

21

22

1 **Q. PLEASE EXPLAIN HOW THE GROWING MISSOURI PROGRAM WILL**
2 **BENEFIT CUSTOMERS.**

3 A. There are numerous reasons why the Growing Missouri Program is beneficial. As
4 previously stated, these projects will promote development in rural areas, thereby
5 enhancing economic growth and creating jobs for Missourians. In addition, over time, as
6 more customers are able to join and access the system, more customers will be paying
7 towards the cost of maintaining Spire’s system – which will ultimately inure to the benefit
8 of all customers.

9 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

10 A. Yes, it does.

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

In the Matter of Spire Missouri Inc.'s Verified)
Request for Authority to Implement a) Case No. GR-2021-0108
General Rate Increase for Natural Gas)
Service Provided in the Company's)
Missouri Service Areas.)
)

A F F I D A V I T

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

Michelle Antrainer, of lawful age, being first duly sworn, deposes and states:

1. My name is Michelle Antrainer. I am the Lead Regulatory Analyst for Spire Missouri Inc. My business address is 700 Market St., St Louis, Missouri, 63101.
2. Attached hereto and made a part hereof for all purposes is my direct testimony on behalf of Spire Missouri Inc. for the above referenced case.
3. Under penalty of perjury, I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

/s Michelle Antrainer

Michelle Antrainer

Dated this 11th day of December, 2020.