

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

In the Matter of Spire Missouri Inc.’s)
Request for Authority to Implement a)
General Rate Increase for Natural Gas)
Service Provided in the Company’s)
Missouri Service Areas)

SPIRE MISSOURI INC.’S NOTICE OF INTENDED RATE CASE FILING

COMES NOW Spire Missouri Inc. (“Spire” or “the Company”), on behalf of its operating units, Spire Missouri East (“Missouri East”) and Spire Missouri West (“Missouri West”) and, pursuant to Commission Rule 20 CSR 4240-4.017(1), files this Notice of Intended Case Filing, respectfully stating as follows:

1. Since its last rate case, Spire has remained focused on providing even better service to its customers, at a great value. Rates are lower now than they were 15 years ago, and are expected to stay that way. However, several developments since Spire’s last general rate case require the Company to file for a general rate increase now.

2. First, Spire has been actively listening to its customers in new and unprecedented ways. Spire’s rate case filing will allow us to implement the new programs and options Spire customers have told the Company they want and expect. This includes environmentally friendly programs, such as renewable natural gas options.

3. The Company has also implemented new measures to enhance service for its customers. These include an online customer portal providing enhanced usage information and account management options around the clock, new technology platforms for streamlined customer and field technician interactions, and ultrasonic metering technology. Spire must be

able to recover these investments now in order to continue providing additional technology enhancements for customers.

4. Spire has also continued to deliver on modernizing its natural gas infrastructure. Since the Company's last general rate case, we've invested more than \$850,000,000 to make our systems safer, greener, and more reliable.

5. This infrastructure replacement program is primarily funded through the Infrastructure System Replacement Surcharge, § 393.1009 RSMo. et seq. ("ISRS"). Because Spire has hit the ISRS cap for its Missouri West operating unit, the Company must now come before the Commission for a general rate case to reset the ISRS cap and keep this critically important program on track.

6. Resetting the ISRS cap is particularly important now. Since Spire's last general rate case, there has been protracted litigation before the Commission and in the courts to deny Spire accelerated recovery of certain investments made under ISRS. While the Missouri legislature has since stepped in to confirm the ISRS eligibility of Spire's replacement programs, there are a variety of prudently incurred infrastructure replacement investments that have been excluded from recovery through the ISRS mechanism. These investments, which are already benefiting our customers, must now be recovered through a general rate case.

7. Finally, while the legacy designations of "Spire East" and "Spire West" have been used since Spire's acquisition of Missouri Gas Energy, we will propose to further unify Spire Missouri through the course of this rate case.

8. For all of the foregoing reasons, Spire intends to file tariffs to initiate a general rate case proceeding pursuant to 20 CSR 4240-4.017(1). This would be the first general rate case

for either operating unit since Case Nos. GR-2017-0215 and GR-2017-0216 were concluded effective April 19, 2018.

9. Typical of other rate cases, Spire expects that this rate case is likely to involve a number of financial, rate design and tariff issues that will be contested. Spire has not engaged in any discussion regarding any substantive issue pertaining to this filing with the office of the Commission (as defined in 20 CSR 4240-4.015(10)) within the ninety days immediately preceding the filing of this notice.

WHEREFORE, Spire respectfully requests that the Commission and its Secretary accept this Notice regarding Spire's upcoming rate case filing.

Respectfully submitted,

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 8th day of October, 2020.

/s/ Goldie T. Bockstruck