

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

In the Matter of the Application of Spire)	
Missouri Inc. d/b/a Spire for Approval to)	File No. GO-2021-0126
Establish an On-Bill Financing Program and)	
Cost Recovery Mechanism)	

RENEW MISSOURI’S RESPONSE

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and offer’s its response to the Staff’s recommendation:

1. On February 26, 2021, the Commission’s Staff filed its recommendation that the Commission reject the tariff sheets and address the company’s PAYS® proposal within the pending rate proceeding, File No. GR-2021-0108.

2. Renew Missouri has been an early and active proponent of PAYS® offerings in Missouri as a cost-effective way to increase and expand energy efficiency throughout the state. To date, the Commission has ordered or permitted the two largest electric companies in Missouri to begin offering this innovative and proven program. The fundamentals of this offering have largely been examined by the stakeholder to this case in a variety of other contexts. There is no reason to delay the procedure until near the end of November 2021. While it’s true gas usage is generally down in the summer, that time could be used implementing the program so that Spire’s customers can realize energy and monetary savings by next winter if this PAYS® proposal is permitted to continue as a stand-alone case.

3. With active PAYS® tariffs in place for two of Missouri’s electric utilities, a tariff template is already in place. The details remaining for the parties to agree upon (or for the Commission to determine after testimony and a hearing) are primarily the scope of the particular

programs offered and the budget. These issues need not be heard within a rate case and should be considered in this separate docket so that the Commission may act sooner and, if it determines to authorize the program (as filed, or modified) allow customers to save energy and money as soon as possible.

WHEREFORE, Renew Missouri respectfully submits its response to the Staff's recommendation, and asks that the Commission deny Staff's request to combine this case with the rate case and direct the parties to file a procedural schedule.

Respectfully,

/s/ Tim Opitz

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 5th day of March 2021:

/s/ Tim Opitz
