

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

In the Matter of a Working Case to)
Consider Best Practices for Recovery of) Case No. AW-2020-0356
Past-Due Utility Customer Payments)
After the COVID-19 Pandemic Emergency)

RESPONSE OF SPIRE MISSOURI INC TO STAFF’S REPORT.

From the beginning of the coronavirus pandemic, Spire Missouri (“Spire” or “the Company”) has been committed to ensuring our community maintains access to safe, reliable natural gas. With so many people struggling to make ends meet, we continue to create new ways to help our customers. Spire is providing funds to assist active Missouri residential customers and small businesses who are struggling to pay their natural gas bills due to the coronavirus pandemic. Spire committed up to \$500,000 in matching gifts through their DollarHelp program for low income customers and has partnered with the United Way. At the beginning of the pandemic. Spire suspended late fees from mid-March through May and customer disconnects from mid-March through June.

Spire appreciates the Commission’s efforts to better understand how COVID-19 is impacting our customers and company. On May 13, 2020, the Commission opened this working case in response to the COVID-19 emergency as a means of addressing the collection of past-due payments and other relevant concerns as they relate to the COVID-19 pandemic. Stakeholders, including Spire, submitted its comments in this case, to a set of Staff questions on July 15, 2020.

Spire also appreciates Staff’s efforts to compile and analyze the mass amount information submitted in this docket and incorporated into Staff’s August 3, 2020 Report. Pursuant to the Commission’s Order directing Parties to respond by August 31 Spire responds to Staff’s report as follows:

Disconnection Moratorium. EEFA recommended implementation and extension of the disconnection moratorium for electric, gas, and water utilities under the Commission’s jurisdiction.

While Spire appreciates the premise behind the suggested disconnection moratorium, the Company feels that absent appropriate parameters, this proposal is not sustainable and potentially harmful for both the utility and customers. Any disconnection moratorium should be accompanied by financial protections as the costs associated with a prolonged disconnection moratorium could result in the loss of millions of dollars to the Company over time.

Restoration of Service without Down Payment. Missouri CAN recommended that utilities restore access to service to any utility customer who has been shut off without requiring a down payment. While the Company empathizes with those customers who have been displaced as a result of COVID-19, a broad policy that eliminates the requirement that *any* customer make a down payment to restore service could have dire financial implications for the Company, particularly when aggregated with some of the other recommendations in this docket. In order for the Company to implement this recommendation, the Company would require adequate assurance of cost recovery in its next rate case.

Waiver of Late Payment Fees and Security Deposits. Again, Spire is empathetic to its customers struggling during these unprecedented times. The waiver of late payment fees and security deposits is something that Company would consider with appropriate parameters limiting the availability of these measures to those customers impacted by COVID-19. The Company would also require adequate assurance of cost recovery in its next rate case.

Programs to address Arrearages. Spire currently has a program in place to assist customers with arrearages. The low-income energy affordability program is available to customers at 0-185% of the federal poverty level. Customers enrolled in the program receive a dollar for dollar match by the Company towards paying down their past due bills. The match ranges from 10% of the original unpaid balance per month or more, depending upon when the customer enrolls in the program. The Company is working to increase awareness of this program so that more customers may utilize the

program going forward.

Flexible and Extended Payment Plans. Several stakeholders recommended deferred payment arrangements that remain in place until at least six months after the Governor's Executive Order expires on December 30, 2020. They further recommend that utilities cease credit reporting during this time period. Spire is open to offering flexible and extended payment plans to its customers to better enable struggling customers to pay their bills. The Company is also flexible on the time period these payment arrangements should remain in place. The Company currently does not engage in credit bureau reporting prior to placement with third party collections, and will continue that practice.

Expanded Access to Energy Efficiency and Retrofit Opportunities. Spire is working with the state's energy efficiency collaborative to broaden the availability of energy efficiency programs to its customers. The Company currently has energy efficiency funds dedicated to its low-income customers.

More Comprehensive Utility Tracking and Reporting of Data. Spire, along with the other state's utilities, currently tracks and reports a significant amount of data to the Office of the Public regarding arrearages, disconnects, the number of accounts enrolled in budget billing, payment plans and other similar information. The Company is willing to continue to do so to the extent the information is helpful in identifying trends and ascertaining best practices and other solutions for limited income customers. In addition, the Commission is requiring the Staff to collect and report monthly utility data to the Commission on disconnections for the remainder of 2020. Spire believes that on whole, more than adequate reporting is in place.

Referral of Customers to Assistance Agencies and Marketing. Agencies generally recommended that utilities continue to refer their customers to assistance agencies and establish clear communication about programs. Spire will continue to refer income eligible customers to the

appropriate community action agency for assistance. The Company is always working to enhance its communication to its customers to increase awareness of its programs.

As noted above, Spire already has several measures in place to assist its low-income customers and the Company will continue to work with community action agencies to reach out to those customers in need. While we do have to be mindful of our sustainability as a Company, we are also sensitive to the needs of our customers and are committed to continuing to look for feasible ways to assist our affected customers through this pandemic.

Respectfully submitted,

SPIRE MISSOURI INC.

By: /s/ Goldie T. Bockstruck

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Certificate of Service

The undersigned certifies that a true and correct copy of the Response of Spire Missouri Inc. was served on all Parties of record on this 31st day of August 2020 via e-mail.

/s/ Goldie T. Bockstruck