

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

In the Matter of Spire Missouri, Inc.)	
d/b/a Spire (East) Purchased Gas Adjustment (PGA)	File No. GR-2021-0127
Tariff Filing)	Tariff No. YG-2021-0110
)	
In the Matter of Spire Missouri, Inc.)	
d/b/a Spire (West) Purchased Gas Adjustment (PGA))	File No. GR-2021-0128
Tariff Filing)	Tariff No. YG-2021-0111

**SPIRE MISSOURI INC’S RESPONSE
TO THE COMMISSION’S ORDER**

COMES NOW, Spire Missouri Inc., on behalf of its operating units, Spire East and Spire West (“Spire” or “the Company”) and for its Response to the Missouri Public Service Commission’s (Commission) Order issued on November 14, 2020, states as follows:

1. On November 14, 2020, the Commission approved Spire’s tariffs on an interim basis, subject to refund, pending final Commission decisions in File Nos. GR-2021-0127, GR-2021-0128, GR-2020-0121, and GR-2020-0122, and those tariffs went into effect on November 16, 2020.

Further, the Commission directed Staff to file the results of its ACA review in this case no later than December 15, 2021.

2. The Commission further ordered Spire and Staff to reply to the response filed by the Office of the Public Counsel (“OPC”), the Environmental Defense Fund (“EDF”), Midwest Energy Consumers Group (“MECG”), and Consumers Council of Missouri (“CCM”) (Collectively hereafter “Commenters”) on November 9, 2020, and recommend how best to address the prudence of the Spire STL Pipeline transaction within this ACA file.

3. Also on November 14, 2020, Spire filed its Response to the Commenter’s filing opposing a procedural schedule at this time and supporting Staff’s Response to the same Motion in which Staff opposed the entry of a procedural schedule in these cases.

4. Spire believes the best approach to address the prudence of the Spire STL Pipeline transaction within this ACA file is to allow Staff to proceed with its long-standing practice and procedure for reviewing gas companies' PGA and ACA costs. As part of that practice and procedure, Staff initiates comprehensive discovery with the Company in order to perform its duty to review and analyze Spire's gas purchasing decisions for the 2019-2020 ACA period and to submit its final report and recommendations to the Commission in December 2021. That discovery process will include information and analysis related to the Spire STL Pipeline service, along with any applicable affiliate transaction rules review.

5. Staff's Report will provide the Commission and all potential parties a better idea of any areas of concern that may require additional inquiry and necessitate the need for a procedural schedule. At that time, the parties can more clearly establish additional discovery requests that would not interfere with the long-standing practice of reviewing PGA and ACA costs.

6. Allowing Staff to file its report and recommendation before establishing a procedural schedule does not prejudice or harm any of the Commenters.

7. Finally, Spire reiterates that much of the Commenter's Motion is devoted to re-litigating arguments already raised by EDF at the Federal Energy Regulatory Commission ("FERC"), relating to the need for the Spire STL Pipeline project. The FERC considered and rejected similar arguments made by EDF in issuing a certificate for the project under the Natural Gas Act, and EDF filed an appeal that is still pending. The Commission is not an appropriate venue to further litigate FERC's decisions, which are already subject to ongoing federal court review. Spire anticipates that this litigation will be complete by the time Staff files its report and recommendation.

8. Spire believes Staff should be given the first opportunity to fully explore these and other questions relating to the inclusion of Spire STL Pipeline transactions in Spire's PGA filings.

WHEREFORE, Spire Missouri respectfully requests the Commission withhold the ordering of a procedural schedule in these cases until such time as Staff has had the opportunity to initiate comprehensive discovery and to perform its duty to review and analyze Spire's gas purchasing decisions for the 2019-2020 ACA period and to submit its final report and recommendations to the Commission in December 2021.

Respectfully submitted,

/s/ Matt Aplington
Matthew Aplington MoBar #58565
General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0785 (Office)
Email: matt.aplington@spireenergy.com

/s/ Goldie T. Bockstruck
Goldie T. Bockstruck MoBar #58759
Director, Associate General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
314-342-0533 Office (Bockstruck)
314-421-1979 Fax
Email: Goldie.Bockstruck@spireenergy.com

ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Response was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of

the Public Counsel on this 30th day of November, 2020 by hand-delivery, fax, electronic or regular mail.

/s/ Goldie T. Bockstruck

Goldie T. Bockstruck