

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

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

**SPIRE’S RESPONSE TO OBJECTIONS TO ITS COMPLIANCE TARIFFS AND  
THE COMMISSION’S NOVEMBER 22<sup>nd</sup> ORDER**

Comes now Spire Missouri Inc. d/b/a Spire (“Spire” or “Company”) and files this Response to the Missouri Public Service Commission’s (“Commission”) Order issued November 22, 2021 and hereby states the following in support of this Response:

1. On October 27, 2021, the Commission issued its *Report and Order* in this case.
2. On November 3, 2021, the Commission issued an *Order Providing Clarification to Report and Order and Delegating Authority*.
3. On November 10, 2021, Spire filed Compliance tariffs to reflect the Commission’s Report and Order with an effective date of December 10, 2021.
4. On November 12, 2021, the Commission issued an *Amended Report and Order* in this case.
5. On November 12, 2021, the Commission also issued an *Order Directing Expedited Responses to Compliance Tariffs* and established the deadline of November 19, 2021 as the date for Staff of the Commission (“Staff”) to file its recommendation or any other party to object or make a recommendation regarding Spire’s compliance tariffs.
6. On November 17, 2021, Spire filed substitute tariff sheets to reflect some changes made by Spire to its compliance tariffs as a result of recent Commission Orders and conversations with Staff.

7. On November 19, 2021, Staff filed a *Motion for Extension* requesting more time to file its recommendation, up to and including until November 30, 2021.
8. Also on November 19, 2021, Midwest Energy Consumers Group (“MECG”) and Vicinity Energy Kansas City, Inc. (“Vicinity”) filed a joint response to the Commission’s November 12 Order citing concerns related to the Large Volume Transportation Service tariff language (“LV transportation tariff”) included in Spire’s compliance tariffs. The Office of Public Counsel (“OPC”) also filed a response noting inconsistencies with the Amended Report and Order and the Company’s Weather Normalization Adjustment Rider (“WNAR”) tariff sheets.
9. On November 22, 2021, the Commission issued an *Order Granting Extension, Shortening Time for Responses and Directing the Parties Meet and Confer*. The Order required Spire to:
  - a. Contact counsel for Staff and OPC by November 23, 2021, to coordinate a meeting regarding the compliance tariffs, and required a minimum of one meeting;
  - b. File a response to the November 19 filings made by MECG, Vicinity, and OPC on or before November 24, 2021; and
  - c. If Spire files a second substitute compliance tariff, Spire shall also file an accompanying pleading explaining how the objections discussed in the body of this order have been addressed.

This Order also granted Staff until November 30 to file its recommendation on the compliance tariffs or request additional time. This Order gives any party the opportunity to file a response to Staff’s recommendation by December 3, 2021.

10. Spire has complied with those requirements as explained further below and in a separate pleading to address the third requirement.
11. On November 22, 2021, Spire reached out to counsel for Staff and OPC via email to inquire into the meeting required by the Order in compliance with the Commission's November 22 Order. Spire also contacted counsel for MECG regarding the transportation tariffs.
12. Counsel for Staff, OPC and Spire agree that a formal meeting on these issues is not necessary at this time, as the Parties have been in discussion recently regarding the Company's compliance tariffs. Additionally, Spire will continue informal discussions with Staff and OPC as appropriate and necessary to finalize tariffs that comply with the Commission's Amended Report and Order.
13. Spire has worked with OPC to revise the WNAR compliance tariff and ensure it reflects the Commission's Amended Report and Order. Spire has confirmed with OPC that the latest revisions made to the Company's WNAR tariff sheets are now in compliance. Staff has been included in these discussions and are still conducting their review.
14. Spire has also discussed the LV transportation tariff with MECG and Vicinity. The LV transportation tariff has been revised to adhere to the previously approved Stipulation and Agreement as noted in the parties' objection, but further discussion is needed. The language included in the Company's LV transportation tariffs regarding the PGA should remain, as this language is applicable to Spire's transportation customers with contract demand provisions. Spire has communicated the intent of the limited applicability of this language to counsel for MECG and Vicinity. Spire plans to meet with these parties to further discuss these tariffs early next week after the holiday.

15. After discussions with Staff, Spire is also filing a full set of substitute compliance tariff sheets, with an issue date of November 23, 2021, and an effective date of December 23, 2021. Spire will continue to work with the Parties on its compliance tariffs and will file substitute tariffs if needed to address any issues that may come up as Staff completes its review.

Wherefore Spire requests the Commission accept this Response to the Commission's November 22 Order.

**/s/ Goldie Bockstruck**

Matthew Aplington MBN 58565  
General Counsel  
Spire Missouri Inc.  
700 Market Street, 6th Floor  
St. Louis, MO 63101  
(314) 342-0785 (Office)  
Email: [matt.aplington@spireenergy.com](mailto:matt.aplington@spireenergy.com)

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

Rachel L. Niemeier, MBN 56073  
Regulatory Counsel  
Spire Missouri Inc.  
700 Market Street, 6th Floor  
St. Louis, MO 63101  
314-390-2623 Office  
Email: Rachel.[Niemeier@spireenergy.com](mailto:Niemeier@spireenergy.com)

**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served electronically, or hand-delivered, or via First Class United States Mail, postage prepaid, on all parties of record herein on this 23rd day of November, 2021.

**/s/ Lew Keathley** \_\_\_\_\_