

**Spire Missouri
GR-2021-0108**

Response to Office of Public Counsel (OPC) Data Request 8000

On page 28 of his direct testimony, Selinger states that the WNAR has had issues.

Please provide 1) a detailed description of each issues including, but not limited to, why it was an issue for the WNAR; and 2) how Spire's proposed RNA will eliminate each issue.

Requested by John Clizer and Lena Mantle (john.clizer@opc.mo.gov and lena.mantle@opc.mo.gov).

Response: The Company believes that the WNAR mechanism is more complicated than it needs to be. The mechanism is updated semi-annually and requires four (4) separate rate components be always in place (i.e. 2 CWNA and 2 SRR rates). The mechanism is calculated by billing cycle, uses ranked degree days, and requires an unbilled calculation. The mechanism has also not provided as close a correlation to volumetric variances as the Company anticipated. Please also see the Company's response to OPC Data Request 8001 for further explanation of this testimony.

The Company's proposed RNA will be tied to billing determinants set in this rate case. In addition, the RNA rates will be calculated on an annual basis and will not require heating degree day information.

Signed by: Wesley Selinger