

**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 Service Provided in the) Company's Missouri Service Areas)	Case No. GR-2021-0108
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**RESPONSE TO ORDER DIRECTING EXPEDITED RESPONSES TO
COMPLIANCE TARIFF AND TO FILED COMPLIANCE TARIFF**

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Response to Order Directing Expedited Responses to Compliance Tariff and to filed Compliance Tariff*, states as follows:

1. The Commission issued its *Order Directing Expedited Responses to Compliance Tariff* on November 12, 2021, that ordered, in part, that “any other party wishing to file objections or a recommendation regarding Spire Missouri’s compliance tariffs shall do so on or before November 19, 2021.”

2. To that end, the OPC notes that the Compliance tariffs filed by Spire were filed November 10, 2021. However, the Commission issued an *Amended Report and Order* November 12, 2021.

3. The Commission’s *Amended Report and Order* would have necessitated changes to the compliance tariffs filed on the 10th due to the amendments made therein. Specifically, the *Amended Report and Order* should have altered the previous calculation of Spire’s revenue requirement due to the change in the capital structure calculation.

4. Further, the OPC has noted what it believes to be several inconsistencies between the *Amended Report and Order* and the filed compliance tariffs regarding the WNAR issue.

5. Given these factors, the OPC asks the Commission to reject the currently filed compliance tariffs and order the parties to this case to meet and work toward mutually agreeable tariffs in compliance with the Commission's *Amended Report and Order*.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission reject the compliance tariffs filed by Spire on November 10th and order the parties to this case to meet and work toward mutually agreeable tariffs in compliance with the Commission's *Amended Report and Order*.

Respectfully submitted,

By: /s/ John Clizer
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this nineteenth day of November, 2021.

 /s/ John Clizer