

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

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

**RENEW MISSOURI’S STATEMENT OF POSITIONS**

COMES NOW Renew Missouri and for its *Statement of Positions* states<sup>1</sup>:

**1. Cost of Capital Issues:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**2. COVID-19 Accounting Authority Order (“AAO”):**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**3. Pension and OPEBs -- What level of pension contributions should be included in rates?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**4. Lobbying:**

Renew Missouri Position:

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<sup>1</sup> The only issue Renew Missouri asserts a position on at this time, is Issue 51. The residential customer charge of \$20 per month for both Spire East and Spire West.

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**5. Dues and Donations -- What organization dues and donations should be removed from Spire East's and Spire West's cost of service?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**6. PSC Assessment -- What is the proper methodology that should be used for the Missouri Public Service Commission ("PSC") assessment?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**7. Credit Card Processing Fees:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**8. Cash Working Capital -- What is the appropriate expense lag days for measuring Spire's income tax lag for purposes of cash working capital?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**9. Severance Expenses -- Should Spire East's and Spire West's severance expense be included in cost of service?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**10. Red Tag and One-Time Energy Affordability Programs -- Should the unamortized balance of Red Tag and one-time Energy Affordability (Spire West only) programs be included in rate base?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**11. Insurance Expense -- What amount of Insurance expense should be included in Spire East's and Spire West's cost of service in FERC account 925?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**12. Injuries and Damages:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**13. Incentive Compensation:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**14. Property Tax:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**15. Capitalized Overheads**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**16. Net Operating Loss (“NOL”) Carryforward**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**17. City Earnings Tax:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**18. Gross Receipts Tax (GRT):**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**19. Corporate Allocations/Affiliated Transactions:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

- 20. What billing determinants and revenue should be ordered in this case?**
- a. Should a weather normalization and days adjustment be applied to the Residential, Small General Service and the Large General Services Classes?**
  - b. Should a weather normalization factor be applied to Spire East and Spire West Large Customer's and Interruptible monthly usage?**
  - c. Should customer growth adjustments be applied to the Residential class?**
  - d. Should a growth adjustment for Spire East's and Spire West's Small General Service and Large General Service rate classes be applied?**
  - e. Should an adjustment be made for customers switching rate classes during the test period?**
  - f. Should an adjustment to billed usage be made for non-residential customers who the Company has estimated will switch rate classes based on new rates approved in this case?**
  - g. Should an adjustment to billed usage be made for conservation as proposed by the Company?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

- 21. Propane Facilities -- Should Spire's propane assets, revenues, and expenses remain in its cost of service?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**22. Research and Development Allowance -- Should an allowance of \$1 million for research and development costs be included in Spire's cost of service?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**23. Rate Case Expense**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**24. Depreciation**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**25. Should the revenue requirement reflect a disallowance of costs and expenses associated with all investment related to CCN Case Nos. GA-2020-0105, GA-2019-0226 and GA-2019-0210 in excess of the capacities assumed in the economic modeling in the underlying CCN?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**26. Ultrasonic Meter infrastructure:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**27. Automated Meter Reading Opt-out Tariff:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**28. Gas Supply Incentive Plan (“GSIP”):**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**29. Purchased Gas Adjustment (“PGA”):**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**30. Rate adjustment mechanism to account for weather, conservation, or both.**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**31. Economic Development Rider (“EDR”) – What if any changes should the Commission approve to the EDR?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**32. Negotiated Gas Service Rider (“NGSR”) – What if any changes should the Commission approve to the NGSR tariff?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**33. Miscellaneous Charges -- Is the Company proposing to increase certain miscellaneous charges in this case?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**34. Cash-Out Balancing -- Should cash-out balancing of transportation customers, similar to what is currently used in Spire West, be made applicable to both Spire East and Spire West?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**35. Proposed Carbon Neutral Initiative program**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**36. Proposed Renewable Natural Gas (“RNG”) program**



Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**37. Renewable Natural Gas (RNG) Procurement**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**38. Rate Schedule Elimination -- Should the Vehicular Fuel, Interruptible, and Large Volume (LV) rate schedules be eliminated as Spire proposes?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**39. Seasonal Rate Schedule -- Should a Seasonal Tariff rate schedule as Spire proposes be promulgated?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**40. Multifamily Developer Subsidy**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**41. Facilities Extension Tariff -- What changes should be made to the Facilities Extension Tariff provisions?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**42. Growing Missouri Tariff**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**43. Customer Choice Provisions -- Should the "Customer Choice" provisions Spire proposes be promulgated?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**44. Residential Retention Optional Schedule -- Should Staff's recommended Residential Retention optional schedule be promulgated?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**45. Miscellaneous Tariff Issues:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**46. Should the Intrastate Transportation tariff be eliminated?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**47. Spire West Non-Residential Rate Design -- What appropriate steps should be taken for Spire West non-residential rate design?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**48. Spire East Non-Residential Rate Design -- What appropriate steps should be taken for Spire East non-residential rate design?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**49. Change from Therms to Ccf -- Should Spire East's basis for sales determinants be changed from Therms to Ccf?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**50. Interclass Revenue Responsibility –**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**51. Residential Rate design –**

Renew Missouri Position:

Renew Missouri favors OPC’s proposal for a uniform a residential customer charge of \$20 per month for both Spire East and Spire west.<sup>2</sup>

**52. Class Cost of Service – How should (1) gas storage and inventory; (2) income taxes; and (3) distribution mains be allocated among the classes?**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**53. Low-income Programs:**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

**54. Bad debt and uncollectibles**

Renew Missouri Position:

Renew Missouri did not file testimony on this issue but reserves the right to base a final position on the evidence presented at hearing.

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully,

/s/ Tim Opitz  
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<sup>2</sup> Marke Rebuttal, p. 13.

Attorney for Renew Missouri

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 19<sup>th</sup> day of July 2021:

/s/ Tim Opitz

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