

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

In the Matter of the Request of Spire Missouri Inc.)
for Waiver from Commission Rule 20 CSR 4240-) **File No. GE-2020-0295**
40.030 (13)(BB))

SPIRE MISSOURI INC'S RESPONSE TO ORDER DIRECTING FILING

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of its operating units, Spire Missouri East ("Spire East") and Spire Missouri West ("Spire West") and in response to the *Commission's Order Directing Responses to Request for Extension ("Order")* respectfully states as follows:

1. On March 20, 2020, Spire Missouri submitted its written request for waiver from Commission Rule 20 CSR 4240-40.030(13)(BB).
2. On March 24, 2020, the Commission issued its *Order Directing Notice, Intervention Requests, and Staff Recommendation*, directing Staff to file its Recommendation no later than June 21, 2020.
3. On June 17, 2020, the Staff filed a *Motion for Extension to File Staff Recommendation*, requesting until July 31, 2020 to file its recommendation, stating that Staff needs additional time to complete discovery.
4. The Commission issued its Order directing Parties to respond to Staff's Motion no later than June 19, 2020.
5. Spire has reviewed Staff's motion and would like to note that Spire is making efforts to expedite the remaining data request responses. The data requests noted in Staff's Motion will be submitted today. Spire will also commit to expediting any additional Staff data requests to aid Staff's timely filing of its recommendation.

6. Counsel for Spire has been in communication with Counsel for Staff. Staff Counsel has indicated that Staff will make every effort to file its recommendation prior to July 31, 2020 if possible. Spire understands that Staff would like the additional time to analyze the information it has received from Spire and wants to ensure that it has enough time to make an informed recommendation to the Commission. With the understanding that Staff is working as expeditiously as possible, and may file its recommendation prior to July 31, 2020, this extension is agreeable to Spire. However, Spire would like to note that the Company is in the process of updating its Distribution Integrity Management Program (“DIMP”) Plan. Updating the DIMP Plan takes several months, and Staff’s recommendation would be beneficial in completing the risk analysis process.

WHEREFORE, Spire Missouri, Inc. respectfully requests that the Commission grant Staff’s request for an extension, encouraging Staff to expedite its recommendation prior to July 31, 2020 if possible.

Respectfully submitted,

/s/ Goldie T. Bockstruck

Goldie T. Bockstruck #58759

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ATTORNEY FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been duly served upon the General Counsel of the Staff and on the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 19th day of June, 2020.

/s/ *Goldie T. Bockstruck*