

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

In the Matter of the Application of Spire Missouri)
Inc. for a Temporary Variance from Rule and)
Tariff Provisions Relating to Late Payment Fees) Case No. GE-2020-0289
And Disconnection Rules and Motion for)
Expedited Treatment)

**SPIRE MISSOURI INC.’S MOTION TO EXTEND
TEMPORARY VARIANCE FROM RULE AND TARIFF PROVISIONS
RELATING TO LATE PAYMENT FEES AND DISCONNECTION RULES
AND MOTION FOR EXPEDITED TREATMENT**

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, pursuant to Commission Rules 20 CSR 4240-2.205 and 20 CSR 4240-13.065 files this Motion to extend the temporary variance from rule and tariff provisions granted by the Missouri Public Service Commission (“Commission”) on March 18, 2020 relating to late payment fees and disconnection rules. Pursuant to Commission Rule 20 CSR 4240-2.080(14), the Company also requests expedited treatment of this Motion. In support thereof, Spire Missouri respectfully states as follows:

1. On March 16, 2020, Spire Missouri filed with the Commission an Application for a temporary variance from the Commission’s rules and the Company’s tariff provisions relating to late payment fees and disconnection rules. The temporary variance was meant to avoid any utility-related actions that would impair the ability of its customers to remain in their homes or obtain vital services and thereby help mitigate the spread of COVID-19.
2. On March 18, 2020, the Commission granted Spire Missouri’s Application for temporary variance and approved the accompanying tariffs to become effective on March 28, 2020. Those tariffs, YG-2020-0157 and YG-2020-0158, are effective through May 1, 2020,

unless extended through a subsequent tariff filing. To that end, the Company is submitting revised tariffs in order to extend the temporary variance through May 31, 2020.

MOTION FOR EXPEDITED TREATMENT

3. Given the exigencies of the COVID-19 pandemic and the need to continue the measures previously implemented for mitigating it, the Company submits that there is good cause to approve the tariffs on an expedited basis and respectfully requests that the Commission approve the tariffs extending the variance by no later than April 21, 2020 so that the tariffs may go into effect no later than May 1, 2020 or by April 22, 2020 at its regularly scheduled agenda meeting if the Commission determines that the such action is appropriate given the concurrence of the Commission Staff (“Staff”) and the Office of the Public Counsel (“OPC”) in the relief requested herein.

4. Spire Missouri submits that harm will be avoided by expedited approval of the tariff sheets by permitting these mitigation measures to continue uninterrupted through May 31, 2020. At the same time, there will be no negative impact on other customers or the general public if the Commission grants such relief. For all of these reasons, Spire Missouri submits that there is good cause for the Commission to approve the tariff sheets to become effective for service rendered on and after May 1, 2020.

5. This pleading was filed as soon as it could have been following the Company’s ongoing assessment of the impacts of COVID-19 on its customers, revealing that additional time would be appropriate to extend the waiver.

6. Spire Missouri has discussed this motion to extend the variance with Staff and OPC and both parties have indicated that they have no objection to the relief requested herein.

WHEREFORE, for the foregoing reasons, Spire Missouri, Inc. respectfully requests that the Commission extend the variances granted by the Commission as described herein and approve the tariff sheets filed on behalf of Spire East and Spire West on this same date.

Respectfully submitted,

/s/ Goldie T. Bockstruck

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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 20th day of April, 2020.

/s/ Goldie T. Bockstruck