

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

In the Matter of the Application of Spire Missouri,                    )  
Inc., for a Certificate of Convenience and Necessity to                )  
Construct, Install, Own, Operate, Maintain, and                        )  
Otherwise Control and Manage a Natural Gas Distribution    ) Case No. GA-2019-0226  
System to Provide Gas Service to a Single Customer in                )  
Barton County as an Expansion of its Existing                         )  
Certificated Areas   )

**AMENDED<sup>1</sup> APPLICATION FOR A CERTIFICATE OF  
CONVENIENCE AND NECESSITY, MOTION FOR  
EXPEDITED TREATMENT, AND REQUEST FOR WAIVER**

COMES NOW Spire Missouri, Inc. (“Spire” or the “Company”), on behalf of its Spire Missouri West operating unit and by and through its undersigned counsel, and, pursuant to RSMo. §393.170, requests the expedited grant of a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system in order to provide gas service to a single customer in Barton County, Missouri. In support of this request, Spire respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. Spire is a public utility and gas corporation, as those terms are defined in RSMo. §386.020, and is a corporation incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri, 63101. A Certificate of Good Standing evidencing Spire West's standing to do business in Missouri was submitted in Case No. GM-2013-0254 and is incorporated by reference herein for all purposes. The information in such Certificate is current and correct.
2. Spire is engaged in the business of distributing and transporting natural gas to customers in Missouri as a gas corporation subject to the jurisdiction of the

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<sup>1</sup> Additional information has been added to the Application to address concerns raised by the Staff of the Commission and the Office of the Public Counsel after the filing of the original Application.

Commission. Spire West provides gas service in western Missouri to customers in the Missouri counties of Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Cooper, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Newton, Pettis, Platte, Ray, Saline, Stone, and Vernon, pursuant to CCNs granted by the Commission.

3. Other than cases that have been docketed at the Commission, Spire has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three years that involve customer service or rates. Spire has no annual report or assessment fees that are overdue.
4. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to the undersigned counsel and to:

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5. Spire seeks a CCN as an extension of its existing certificated area to serve one particular property, as described in the documents attached as Appendix 1. Appendix 1 has been identified as Confidential pursuant to Commission Rule 4 CSR 240-2.135(2)(A)1, because it contains information relating directly to a specific customer or potential customer.
6. If granted, this application would extend Spire West's certificated service area to include Township 32 North, Range 31W, Sections 15, 16, 21, and 22. Attached as Appendix 2 is a map showing the requested service area. Attached as Appendix 3 is a redlined tariff sheet, adding the requested area to Spire West's service territory.
7. The potential customer at the subject property contacted Spire with a need for a line extension to serve a new irrigation operation. This potential customer only recently became aware of Spire's presence in Barton County and other pending applications for CCNs in Barton County. As explained in the signed affidavit, attached hereto as Appendix 1, the potential customer must have equipment ordered by February 11, 2019, in order to have it installed in time for it to be used in irrigation operations. Therefore, Spire is requesting expedited approval of this CCN application.
8. The rates for the proposed customer will be those approved and in effect for the customers in the adjoining Spire West operating unit certificated areas, until such rates may be changed by approved tariff or order of the Commission.
9. No external financing will be required for construction related to serving this proposed customer, and a full line extension contribution will be assessed to and collected from the proposed customer. As such, Spire seeks a variance from the Rule requirements with regard to the provision of a plat and a feasibility study.
10. Spire holds all necessary franchises and permits from municipalities, counties, or other

authorities that are required for Spire to serve the subject property.

11. Spire's experience in the operation of natural gas systems gives it the ability to provide this service in an efficient manner. For all reasons set forth herein, a grant of the application will further the public convenience and necessity.

**Motion for Expedited Treatment**

12. Spire respectfully requests that this application be approved by February 11, 2019, or as soon as possible thereafter. Spire understands the unusual nature of this request, but hopes that the limited scope of the request makes it feasible, as the grant of the requested CCN will certainly benefit the proposed customer's operations, create investment in Southwest Missouri, and not have an adverse effect on other customers or the general public.

13. Spire filed this application as soon as it could after it became aware of the situation.

WHEREFORE, Spire requests, for good cause shown, that the Commission waive the 60-day notice requirement of 4 CSR 240-4.017(1) as prayed for the original Application, grant a variance from the filing requirements of Commission Rule 4 CSR 240-3.205(1)(A), approve this Application expeditiously, issue a CCN to Spire as set forth above and in the attached schedules, and grant such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:

/s/ Diana C. Carter  
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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 7<sup>th</sup> day of February, 2019, with notification of the same being sent to all parties of record.

      /s/ Diana C. Carter