

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

In the Matter of Spire Missouri Inc.'s        )  
Proposed School Transportation            )  
Tariff Filing                                    )        **Case No. GT-2020-0187**

**SPIRE MISSOURI'S RESPONSE TO  
STAFF'S MOTION TO OPEN DOCKET AND SUSPEND TARIFF SHEET**

**COMES NOW** Spire Missouri Inc. ("Spire Missouri" or the "Company") and files this Response to Staff's Motion to Open Docket and Suspend Tariff Sheet ("Staff's Motion"), stating as follows:

1. In November 2019, Spire Missouri added Spire STL Pipeline as a pipeline capacity supplier in the Spire Missouri East ("SME") service territory. Based on requests made by Eligible School Entities (the "Schools"), on December 18, 2019, Spire Missouri filed a revised Tariff Sheet 15.1 to simply reflect this capacity alternative under SME's School Transportation Program (the "Program"). Based on recent discussions with Staff, Spire Missouri intends to revise its tariff as discussed herein and defer the effective date of the tariff to February 21, 2020, in order to give the parties an opportunity to reach consensus on agreed tariff language. Staff has represented that it could issue a recommendation by February 7, 2020, which is well in advance of the February 21 tariff effective date. Spire Missouri requests that the Commission defer opening a docket or suspending the tariff filing until after the Company has had an opportunity to respond to Staff's February 7, 2020 recommendation.

2. Prior to 2019, MRT (now Enable) represented about 85% of the pipeline capacity into SME's service territory. As Staff indicated in its Motion, the remaining

capacity came from Southern Star and Panhandle Eastern (“PEPL”), which offered limited amounts of capacity that were important to SME’s ability to serve the western portion of its network.

3. Because it was important for SME to retain full access to the limited capacity on Southern Star and PEPL, the Program tariff allowed only for the release of MRT capacity to the Schools. This was, of course, a minor limitation, since MRT capacity covered 85% of SME’s incoming pipelines.

4. The advent of Spire STL Pipeline added another major pipeline supplier to SME’s territory, in addition to MRT (Enable). The Schools approached Spire Missouri and requested access to the new pipeline. Spire viewed the Schools’ request as reasonable, and therefore made the Tariff filing, removing the constraint that limited the Schools to only using MRT (Enable) capacity. However, Staff’s Motion notes that the removal of the MRT (Enable) limitation technically opens the Southern Star and PEPL capacity to the Schools.

5. In order to restrict the tariff change to only the Spire STL Pipeline addition, Spire Missouri will revise its tariff filing to provide that it will release capacity to the Schools from either Enable or Spire STL Pipeline. This would maintain the status quo, as the Schools would continue to have access to all of SME’s capacity except for Southern Star and PEPL. Spire Missouri has discussed this revision with Staff, and Staff was agreeable to the change. Deferring the effective date to February 21 will hopefully provide sufficient time for the parties to reach consensus on an appropriate tariff change.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission accept this pleading and defer opening a docket and suspending the tariff filing until after the

Company has had an opportunity to respond to Staff's February 7, 2020 recommendation, in order to provide the parties an opportunity to reach consensus on agreed tariff language.

Respectfully submitted,

By: **/s/ Rick Zucker**

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### **CERTIFICATE OF SERVICE**

I certify that copies of the foregoing have been mailed, emailed, hand-delivered or transmitted by facsimile to counsel of record this 6th day of January, 2020.

**/s/ Rick Zucker**