

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's Tariffs to Increase)
Its Revenues for Natural Gas Service) **Case No. GR-2019-0077**

SPIRE MISSOURI'S POSITION STATEMENT

COMES NOW Spire Missouri Inc. and files this statement of its position on the issues set forth in the List of Issues filed in the referenced case on July 19, 2019, stating as follows:

1. Spire Missouri does not oppose the Stipulation and Agreement filed by certain parties on July 17, 2019.

2. The following is the Joint List of Issues. Spire Missouri takes no position on these issues.

1. Regulatory Policy and Summary Testimony
2. What should be Ameren Missouri's authorized revenue requirement?
3. What is the appropriate capital structure?
4. What is the appropriate range for return on equity (ROE)?
5. What is the appropriate ROE for Infrastructure System Replacement Surcharge (ISRS)?
6. Should there be a property tax tracker? If so, what should it be?
7. Should there be a pension/OPEB tracker? If so, what should it be?
8. What amortizations of regulatory assets and liabilities should be used for setting rates in this case?
9. What should be the design and budget of Ameren Missouri's energy efficiency program?

10. Who should administer the Company's Income-Eligible Weatherization Assistance Program ("IEWAP")?
11. Should Ameren Missouri include in its rate design a volume indifference reconciliation to normal (VIRN) mechanism? If so, how should it be designed?
12. How should depreciation be treated?
13. What changes should be made to the billing statement?
14. When should Ameren Missouri file its next gas rate case?
15. What should the residential monthly customer charge be?
16. How should the revenue requirement decrease be allocated to customer classes and what are the appropriate billing units to be applied?
17. Should the Rolla Area PGA/ACA be consolidated with the system-wide PGA/ACA rate?

3. The following are additional issues suggested by the Missouri School Board Association (MSBA). Spire Missouri takes no position on these issues.

1. MSBA's primary issue is that the current tariff cash-out rate for inadvertent over or under delivery of monthly gas volumes of schools is not cost-based per Section 393.310 RSMo., charges the schools a penalty price of the greater of 110% of the PGA price or the monthly spot market index plus \$0.15 per Ccf when the schools owe for inadvertent gas but the Company only pays 90% of monthly spot market index price if the schools are owed, and was established for large volume industrial type prior to Section 393.310 RSMo. becoming law in 2002;
2. MSBA's second issue is that rate provisions pertaining only to the school transportation should be in a separate rate schedule or separate section of the general transportation rate schedule for clarity of understanding and applicability; and,
3. MSBA's third issue is that all rate revenue reductions be equitably allocated within the transportation rate class to prevent discrimination to small volume transportation customers by allocating the class revenue reduction proportionately to all revenue-producing rate components based on test year pre-reduction non-rate revenue and not just on the

second volumetric usage block which only large industrial-type users have sufficient usage to reach that rate block.

4. Finally, the following are additional issues suggested by the Office of Public Counsel. With respect to issue 3 below, Spire Missouri believes the Commission should follow its longstanding policy of approving prudent rate case expenditures and denying imprudent expenditures. Spire Missouri intends to address this issue in briefing. Spire Missouri takes no position on the other OPC issues

1. What should happen to any balance of the unspent energy efficiency funds?
2. What depreciation rates should be ordered for the general plant accounts?
3. Should the Commission follow its policy of sharing rate case expense between shareholders and customers?
4. What amount of management expenses should be included in this case?
5. What should Ameren Missouri's weatherization program include?
6. What is the proper amount of depreciation study expense to be included in this case?
7. Has any inappropriate affiliate transaction expense been identified in this case?

WHEREFORE, Spire Missouri respectfully requests that the Commission accept the Company's Statement of Position in this case.

Respectfully submitted,

By: **/s/ Rick Zucker**

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 22nd day of July, 2019.

/s/ Rick Zucker