

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

In the Matter of Spire Missouri Inc.’s) Case No. GO-2019-0058
d/b/a Spire’s Request to Decrease WNAR) Tracking No. YG-2019-0039

In the Matter of Spire Missouri Inc.’s d/b/a) Case No. GO-2019-0059
Spire’s Request to Increase its WNAR) Tracking No. YG-2019-0040

**REPLY TO STAFF’S LIST OF ISSUES LIST OF ISSUES, IDENTIFICATION OF
WITNESSES, AND ORDER OF CROSS-EXAMINATION**

COMES NOW Spire Missouri Inc, d/b/a Spire (“Spire” or “Company”), on behalf of its operating units, Spire East and Spire West, and submits this Reply to Staff’s List of Issues, Identification of Witnesses and Order of Cross-Examination. In support thereof, Spire states as follows:

1. Around 1pm this afternoon, the Staff filed its List of Issue, Identification of Witnesses and Order of Cross-Examination. Prior to the time Staff made its filing, the Company had circulated an additional round of proposed edits to the List of Issues but the Staff did not respond or otherwise communicate with the Company regarding these edits. As a result, the Company’s only option at this point is to submit a response to what Staff filed.

2. At the outset, the Company wishes to note that it has no objection to the Identification of Witnesses and Order of Cross-Examination set forth in Staff’s pleading. The Company does, however, have concerns regarding the description of the issues contained in Staff’s filing. First, Staff’s description of Issue 1(a) obscures the fact that Staff is proposing to re-apply its ranking methodology each time a Weather Normalization Adjustment Rider (“WNAR”) rate adjustment is calculated, a result that the Company believes is neither required nor authorized by its current WNAR tariff. Second, the Staff’s description of Issue 1(b) references the use of 2016 weather data without acknowledging that this is the weather data that was used to establish rates

in the Company's last rate case. In other words, this is not a randomly selected set of data that the Company is proposing to use, but the specific output of the rate case process. Third, the Company believes that Issue (2) as identified by Staff is not a proper issue. In the guise of divining Commission intent (as it may or may not have existed many months ago), the introduction of this issue is essentially attempting to litigate the merits of using the ranking method versus not using it whenever a WNAR adjustment is made. The Company does not believe that there is any ambiguity in its tariffs on this score, as there is nothing in them to suggest that Staff's ranking methodology was to be reapplied each time a WNAR adjustment is calculated.

3. Given these considerations, the Company believes that the issues in this proceeding are more accurate and appropriately defined as follows.

(1) Does the tariff language stating that Weather Normalization Adjustment Rider ("WNAR") adjustments shall be calculated using "*the total normal heating degree days based upon Staff's daily normal weather as determined in the most recent rate case*" mean:

- a.) That the Staff's ranking methodology that was used to create the normal HDD in the rate case is to be updated and re-applied in making each WNAR adjustment between rate cases or,
- b.) That Staff's normal HDD that was set and determined in the most recent rate case is to be used in making each WNAR adjustment between rate cases without re-application of the ranking methodology?

4. The Company will, of course, abide by whatever list of issues the Commission approves, but it wanted to make sure its concerns regarding the Staff's pleading were considered.

WHEREFORE, for the foregoing reasons, Spire Missouri Inc. respectfully requests that the Commission consider this reply and adopt the list of issues set forth above.

Respectfully submitted,

SPIRE MISSOURI INC.

/s/ Michael C. Pendergast
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on Staff and the Office of the Public Counsel, on this 7th day of January 2019 by hand-delivery, fax, electronic mail or by regular mail, postage prepaid.

/s/ Rick Zucker _____