

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

In the Matter of the Application of Spire Missouri)	
Inc. for a Temporary Variance of its Meter)	
Sampling Program for Diaphragm Meters During)	Case No. GA-2023-xxxx
Deployment of Ultrasonic Automated Metering)	
Infrastructure.)	

**VERIFIED APPLICATION FOR VARIANCE OF METER TESTING REQUIREMENTS
AND FOR WAIVER FROM 60-DAY NOTICE RULE**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or "Company"), by and through its counsel, and pursuant to Commission Rules 20 CSR 4240-2.060(1) and (4), 20 CSR 4240-2.080, and 20 CSR 4240-2.205 and submits this Verified Application (“Application”) to the Missouri Public Service Commission (“Commission”) for a variance from the Company’s meter sampling program, authorized by the Commission to meet the requirements of 20 CSR 4240-10.030 (19), for diaphragm meters during the deployment of ultrasonic automated metering infrastructure. Pursuant to Commission Rule 20 CSR 4240-4.017(1)(D), the Company also requests a waiver from the notice provisions of Rule 20 CSR 4240-4.017(1). In support of this Application, Spire Missouri respectfully states as follows:

1. Spire Missouri is a public utility and gas 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 Missouri’s standing to do business in Missouri is filed in Case No. GU-2020-0376 and incorporated herein by this reference. The information on such Certificate is currently applicable and correct.

2. Spire Missouri is primarily engaged in the business of distributing and transporting natural gas to customers in both the eastern and western portions of the State of

Missouri, subject to the jurisdiction of the Commission. Spire Missouri serves customers in the City of St. Louis and ten counties in Eastern Missouri through its Spire East operating unit. Spire Missouri serves customers in the City of Kansas City and thirty counties in Western Missouri through its Spire West operating unit.

3. Communications in regard to this Application should be addressed to undersigned counsel and the persons below:

Name: Michelle Antrainer
Title: Manager, Rates and Planning
Spire Missouri Inc.
700 Market Street, 5th Floor
St. Louis, Missouri 63101
Phone: (314)-499-5658
Email: shelly.antrainer@spireenergy.com

4. Other than cases that have been docketed at the Commission, Spire Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates. Spire Missouri currently has no pending actions against it involving customer service.

5. Spire Missouri is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

6. The affidavit of James Rieske is included with this application, stating that all information referenced herein is accurate and truthful.

BACKGROUND

7. Spire Missouri Inc. is transitioning from the current diaphragm meter technology to ultrasonic metering technology in both Spire Missouri West (“Missouri West”) and Spire Missouri East (“Missouri East”).

8. In Missouri East, the Company's diaphragm meters are read by a network owned and maintained by Landis & Gyr ("L&G"). This system was originally built for meter reading on the Ameren Missouri system; however, Ameren is no longer using the system. The L&G system, originally installed in 2005, has become obsolete and expensive to maintain, and components of the system have begun failing. Further, L&G has stopped manufacturing new equipment that is compatible with this system. In 2018, L&G notified Spire Missouri that it would no longer be supporting the diaphragm meters on its system after April 1, 2025, which coincides with the expiration of the current L&G contract with Spire Missouri for meter reading services.

9. In response, Spire Missouri began evaluating next generation automated metering infrastructure ("AMI") and the use of ultrasonic meters. After reviewing vendor proposals and technologies, the Company selected Itron ultrasonic meters as its new metering standard due to its extensive safety benefits and applicability to the existing infrastructure of Spire Missouri, as well as the infrastructure of its regulated utility affiliates in other states.

10. The Itron ultrasonic meter provides extensive safety features when compared to the current diaphragm meters, such as internal shut off valves, temperature sensors, remote shut offs, and, with ultrasonic meters installed starting Fall 2023, pressure sensors. In addition to its safety improvements, the Itron ultrasonic meter allows more accurate customer usage measurement during the entire meter life cycle, providing more granular data for Company and stakeholder analysis and customer review. Further detail on the benefits of the ultrasonic meter has been included in testimony provided by James Rieske in Spire Missouri's last two general rate cases, GR-2021-0108 and GR-2022-0179.

11. After selecting the Itron ultrasonic meter as the new standard, the Company began to replace diaphragm meters in Missouri West starting in June 2020 and in Missouri East in June 2021. As of February 1, 2023, for its 250 cubic feet per hour ("250cfh") diaphragm meters, the

Company has replaced 138,322 of 531,866 meters in Missouri West, and 103,885 of 643,780 250 meters in Missouri East. This leaves the Company with 393,544 250cfh diaphragm meters to be replaced in Missouri West, and 539,895 250cfh diaphragm meters to be replaced in Missouri East. Spire Missouri also has a small percentage of 400 and 600 cubic feet per hour diaphragm meters that will also be replaced with ultrasonic meters.

12. For Missouri West, the Company's replacement strategy is to replace eligible diaphragm meters when the Company is already at a customer premise for another purpose. Spire Missouri will continue to target any meter types already identified as underperforming by the current testing program. As discussed below, the Company may accelerate the meter replacements for Missouri West service territory if this requested variance is granted and additional resources become available.

13. For Missouri East, due to the expiration of the L&G contract on April 1, 2025, the Company is accelerating its replacement strategy to replace as many eligible diaphragm meters as possible before that date. In accordance with prior orders of the Commission, the Company is only targeting for replacement those meters that have been in service for at least 10 years or are inside a customer's premise. Spire Missouri's current target is to replace 473,806 250cfh diaphragm meters in Missouri East before the expiration of the L&G contract, which represents diaphragm meters that either have been in service for at least 10 years as of February 1, 2023 or are inside a customer's premises.

14. Of these 473,806 diaphragm meters targeted for replacement by April 1, 2025, 334,022 meters are installed outside customers' premises ("outside meters") and 139,784 meters are installed inside customers' premises, such as in a home's basement ("inside meters"). Again, the outside meters currently being targeted for replacement by April 1, 2025 have been in service for at least 10 years as of February 1, 2023. Any remaining outside meters that have been in

service for at least 10 years after February 1, 2023, will be targeted for replacement after April 1, 2025. The 139,784 inside meters targeted for replacement by April 1, 2025 represent the total number of inside meters remaining on the Missouri East system, regardless of the age of the meter.¹

EXISTING METER SAMPLING PROGRAM

15. Under Commission Rule 20 CSR 4240-10.030(18), the Company must meet specific standards and margins of error for its gas service meters. Generally, the rule requires that a gas meter shall not have an error in measurement in excess of two percent (2%). Further, Commission Rule 20 CSR 4240-10.030(19) requires that each gas service meter shall be periodically removed, inspected, and tested at least once 120 months, or 10 years, or as often as required to comply with Section (18).

16. In Case No. GO-91-353 for Missouri West and in Case No. GO-95-320 for Missouri East, the Commission approved Spire Missouri's waiver requests from Section (19). The waiver authorizes the Company's existing meter sampling program for the removal, testing, and inspection of gas meters. Currently, the meters covered by this sampling program are diaphragm 250, 400, or 600 class meters. Under this program, instead of testing each existing diaphragm meter after it has been in service for 10 years, the Company randomly samples meter groups of similar vintage that are representative of those meters that would otherwise need to be individually tested under the rules. If a specific threshold of a meter group fails to test within the set parameters for accuracy under Section (18), then the entire population of that meter group is required to be replaced within a certain timeframe. The length of the timeframe is set based upon on how poorly the sample scores on accuracy, with the maximum being 5 years. This

¹ All inside diaphragm meters will be replaced by April 1, 2025 as the ultrasonic meter safety benefits realized by customers, the Company, and the public are amplified when a customer's meter is located inside the residence, and

means that should a sample of meters fail a test, the entire set of meters would be in service for no more than 15 years.

VARIANCE REQUEST

17. Spire Missouri submits this Application for a variance from its meter sampling program which would suspend sample testing for all remaining 250, 400, and 600 class diaphragm meters on Spire Missouri's system. Spire Missouri's replacement strategy is to target diaphragm meters once they have been in service for 10 years, and to replace each 10-year-old meter within 5 years. Therefore, continuing to perform sample testing of the diaphragm meters represents an inefficient use of the Company's time and resources, when the meters would be replaced anyway within the time frame required by the current meter sampling program. This is especially true in Missouri East, where the Company must accelerate its replacement of diaphragm meters with ultrasonic meters due to the L&G contract ending on April 1, 2025.

18. For waivers and variances from Commission rules and tariff provisions, Commission Rule 20 CSR 4240-2.060(4) requires the filing of an application stating the applicable rule or tariff for which the waiver is sought, good cause for granting the waiver, and the name of any public utility affected by the waiver.

19. Spire Missouri is requesting this variance from its current meter sampling program, which was authorized when the Commission granted waivers from Commission Rule 20 CSR 4240-10.030(19) in Case No. GO-91-353 for Missouri West and in Case No. GO-95-320 for Missouri East. The requested variance would suspend this meter sampling program and any testing required under Rule 20 CSR 4240-10.030(19) for all diaphragm meters on Spire Missouri's system.

the ultrasonic meters reduce inconvenience for customers due to their remote capabilities.

20. Should the Commission grant this variance, Spire Missouri's current replacement strategy would remain mostly static. The strategy is to target and replace diaphragm meters once they have been in service for 10 years. However, with the variance, Spire Missouri would suspend the testing of meters that are targeted for replacement, and instead ensure that those meters are replaced within 5 years or less. Further, the Company would not allow any meter to exceed 15 years in service without being replaced, which is the maximum allowable time frame for failing meter samples under the current meter sampling program approved by the Commission.

21. In Missouri West, the Company would divert testing resources to the diaphragm meter replacement strategy if the variance is granted. While the Company is not experiencing the same pressures in Missouri West as it is in Missouri East, the Company will still reevaluate its available resources to determine possible acceleration of its strategy.

22. However, in Missouri East, the variance from the sampling program will allow the Company to divert valuable time and resources, otherwise utilized for testing, to the accelerated replacement strategy for the bulk of the remaining diaphragm meters served by the existing network that will no longer be supported by L&G as of April 1, 2025. Specifically, this would facilitate the replacement of 473,806 250cfh diaphragm meters that, as of February 1, 2023, have been in service for at least 10 years or are located inside a customer's premise. These 473,806 meters would be replaced by April 1, 2025. For all remaining diaphragm meters in Missouri East, the Company would wait until each meter has been in service for 10 years.

23. For all meters not covered by the meter sampling program, the Company will continue to abide by the testing requirements under the Commission's Rules.

24. The Company requests that this variance be effective within 30 days of a Commission order granting this application and terminate on the date that the final diaphragm meter on Spire Missouri's system is replaced.

25. Good cause exists for granting the Company's variance request. Suspending the meter sampling procedure will allow the Company to conserve time and resources that can be more efficiently directed to the replacement strategies, which target nearly 500,000 meters for replacement before April 1, 2025 in Missouri East, many of which are inside meters. These are resources that could be directed towards a more efficient deployment of the AMI technology that will allow Spire Missouri's customers, employees, and the public to sooner realize the benefits of enhanced safety, measurement accuracy and data collection, and increased savings associated with the ultrasonic meters. Further, continued testing of meters that are already going to be replaced represents an unnecessary expense, the elimination of which is a reduced cost to Spire Missouri's customers. Continuing to test meters to determine whether they need to be replaced within five years is redundant and inefficient when those meters are already planned to be replaced within five years.

26. Spire Missouri will continue to provide updates to the Staff of the Commission and other interested stakeholders on its progress in its installation of ultrasonic meters, as agreed to in the Stipulation in GR-2022-0179 approved by the Commission.

27. Spire Missouri would also note that the Commission has granted a similar variance request for one of its peer utilities in Missouri. The Commission granted Ameren Missouri's request for a variance from its meter testing requirements in Case No. EE-2019-0383.

28. Spire Missouri will be the only public utility affected by this waiver application.

29. As good cause exists for this variance, and the Company will be the only public utility affected by this variance, Spire Missouri respectfully requests the Commission grant this

Application suspending the Company's meter sampling procedure until the Company has finished replacing the diaphragm meters its system.

REQUEST FOR WAIVER OF 60-DAY NOTICE

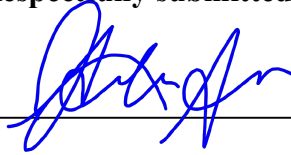
30. Commission Rule 20 CSR 4240-4.017(1) provides, in part, as follows:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

Rule 20 CSR 4240-4.017(1)(D) permits a party to request a waiver of the above cited rule for good cause. The rule provision specifically provides that good cause may be established by submitting a verified declaration that the filing party has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. The Company interprets this to mean that good cause is established if the filing party has had no communication with a member of the office of the Commission outside of pleadings or other public communications. Subject to that understanding, the Company submits the verified declaration of James Rieske that neither the Company nor any person or entity acting on behalf of the Company or its Missouri operating units, has had a communication with a member of the office of the Commission in the last 150 days regarding any substantive issues that are likely to arise in the case. For that reason, the Company requests that the Commission grant a waiver of the 60-day notice requirement for Spire Missouri's request for a variance from its meter sampling procedure.

WHEREFORE, Spire Missouri respectfully requests that the Commission grant the Company's Application for a variance from its meter sampling and grant the Company's waiver of the 60-day notice requirement.

Respectfully submitted,



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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was serve on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 11th day of April, 2023.

/s/ Lew Keathley
Lew Keathley

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

In the Matter of the Application of Spire Missouri)
Inc for a Temporary Variance of Meter Testing)
Requirements During Deployment of Ultrasonic) Case No GA-2023-xxxx
Automated Metering Infrastructure in its Missouri)
East service territory.)

**VERIFIED DECLARATION OF
MICHELLE ANTRAINER**

State of Missouri)
) SS
County of St. Louis)

I, Michelle Antrainer, being of lawful age and first duly sworn, state that I am the Manager, Rates and Planning for Spire Missouri, Inc. My business address is 700 Market St., St. Louis, Missouri 63101. I am authorized to make this verification and have knowledge of the matters stated herein Under penalty of perjury, I hereby swear and affirm that I have read the foregoing request for waiver of 20 CSR 4240-24.017(1), and hereby declare that, other than pleadings or other public communications, Spire Missouri, Inc has had no communication with the office of the Commission within the prior one hundred and fifty (150) days regarding any substantive issue likely to be in the above referenced case.



April 10, 2023

Dated

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

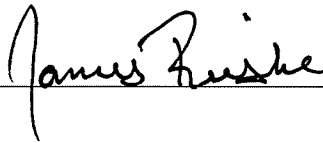
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Requirements During Deployment of Ultrasonic) Case No. GA-2023-xxxx
Automated Metering Infrastructure in its Missouri)
East service territory.)

AFFIDAVIT OF JAMES RIESKE

State of Missouri)
) SS
County of St. Louis)

I, James Rieske, being of lawful age and first duly sworn, deposes and states:

1. I am the Director, Measurement for Spire Missouri, Inc. My business address is 700 Market St., St. Louis, Missouri, 63101.
2. I am authorized to make the following declarations on behalf of Spire Missouri, Inc. and have knowledge of the matters stated herein.
3. As required by Commission Rule 20 CSR 4240-2.060(1)(M) and under penalty of perjury, I hereby declare that the matters and things stated in the foregoing Application are true and correct to the best of my knowledge and belief.



April 10, 2023

Dated