# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Spire Missouri, Inc. d/b/a Spire to Change its	) )
Infrastructure System Replacement	Case No. GO-2022-0171
Surcharge in its Spire Missouri East and	
West Service Territories	

## SPIRE MISSOURI INC'S MOTION FOR EXPEDITED TREATMENT

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of itself and its two operating units, Spire Missouri East ("Spire East") and Spire Missouri West ("Spire West") and, pursuant to Rule 20 CSR 4240-2.080 (14) submits this Motion for Expedited Treatment to permit the Revised Tariff Sheet filed by the Company on this date to become effective on May 1, 2022. As defined in the Unanimous Stipulation and Agreement (the "Agreement") filed as part of this case, all parties agreed that the tariffs would become effective no later than May 15, 2022. In support thereof, the Company states as follows:

- 1. On April 21, 2022, the Commission issued its *Order Approving Unanimous Stipulation and Agreement* in the above-captioned case in which it rejected the tariff sheet originally filed by Spire Missouri on December 23, 2021 and authorized the Company to file a new revised tariff sheet sufficient to recover ISRS revenues in the amount of \$3,140,682 for its Spire East service territory and \$5,363,495 for its Spire West service territory. Consistent with the statutory deadline set forth in the ISRS Statute (*see* Sections 393.1009 RSMo. to 393.1015 RSMo.) for processing ISRS applications, the Commission made its Order effective on May 1, 2022.
- 2. In the Order, the Commission directed Spire Missouri to file a tariff sheet consistent with the Agreement approved by the Commission which states that new rates implemented as a

result of the Agreement should be made effective between April 23, 2022 and May 15, 2022. In compliance with the Commission's Order, the Company has contemporaneously filed with this Motion for Expedited Treatment, a new tariff sheet to recover the ISRS revenues authorized by the Commission.

- 3. The purpose of this Motion for Expedited Treatment is to enable the Revised Tariff Sheet filed on this date to become effective on May 1, 2022 if practical.
- 4. Spire Missouri submits that harm will be avoided by expedited approval of the revised tariff sheet since it will permit the new ISRS revenues authorized by the Commission in this case to become effective within the 180-day time period mandated by the ISRS Statute. At the same time, there will be no negative impact on other customers or the general public if the Commission grants such relief. For all of these reasons, Spire Missouri submits that there is good cause for the Commission to approve the proposed tariff to become effective on May 1, 2022.
- 5. This pleading was filed as soon as it could have been following the Company's preparation and filing of the Revised Tariff implementing the terms of the Order issued by the Commission in this case on April 21, 2022.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that the Commission consider and grant this Motion for Expedited Treatment and approve the Revised Tariff Sheet to become effective on May 1, 2022.

#### Respectfully submitted,

#### /s/ Goldie T. Bockstruck

Matthew Aplington MoBar #58565 General Counsel Spire Missouri Inc. 700 Market Street, 6<sup>th</sup> Floor St. Louis, MO 63101 (314) 342-0785 (Office) Email: matt.aplington@spireenergy.com

Goldie T. Bockstruck MoBar #58759 Director, Associate General Counsel Spire Missouri Inc. 700 Market Street, 6th Floor St. Louis, MO 63101 314-342-0533 Office 314-421-1979 Fax Email: Goldie.Bockstruck@spireenergy.com

Rachel L. Niemeier, MoBar #56073 Regulatory Counsel Spire Missouri Inc. 700 Market Street, 6th Floor St. Louis, MO 63101 314-390-2623 Office

#### ATTORNEYS FOR SPIRE MISSOURI INC.

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing Unanimous Stipulation and Agreement was served on all counsel of record on this 21<sup>st</sup> day of April, 2022 by electronic mail.

/s/ Julie L. Trachsel
Julie L. Trachsel