



Spire Inc.  
700 Market St.  
St. Louis, MO 63101

July 2, 2020

VIA EFIS

Secretary Morris Woodruff  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
Jefferson City, MO 65101

Dear Secretary Woodruff:

Enclosed herewith for filing with the Missouri Public Service Commission are the revised tariff sheets, P.S.C. MO. No. 7 Second Revised Sheet No. R-31.3 Cancelling P.S.C. MO. No. 7 First Revised Sheet No. R-31.3 and P.S.C. MO. No. 8 Second Revised Sheet No. R-31.3 Cancelling P.S.C. MO. No. 8 First Revised Sheet No. R-31.3 in regards to the Eastern and Western Missouri operating divisions of Spire Missouri Inc. d/b/a Spire (the "Company"). These revised tariff sheets, have an issue date of July 2, 2020, and an effective date of August 1, 2020, reflected by the Company's tariffs.

In April of this year, the Commission approved a revision to Spire's Low-income Affordability tariff that focused on assisting customers affected by COVID-19 by making even more funding available to Spire's low-income customers within the federal poverty level of 136%-185%. Eligible customers could receive a one-time bill credit up to \$100. In order to assist an even broader range of Spire customers, Spire is submitting another revision to the tariff for Commission approval by expanding program eligibility to customers within 0%-185% of the federal poverty level.

When Spire originally developed its assistance program, Spire researched residential customer demographic data and examined poverty levels in an effort to provide assistance to customers who may not have other funding options. After reviewing the data and considering that customers in the 0-135% Federal Poverty Level would be eligible for LIHEAP assistance, the Company determined that Spire's low-income affordability funds would be best utilized for customers not eligible for LIHEAP assistance but still in need of funding. Spire determined that it should make funding available to those customers within the 136% - 185% Federal Poverty Level.

With Commission approval, Spire launched its Low-Income Energy Affordability program, in partnership with the United Way, directing LIHEAP-eligible customers to apply for LIHEAP and customers eligible for Spire funds to receive the Spire assistance credit. Using the customer's preferred method of contact, the Company attempted to reach each customer that applied for any type of assistance, and for those who did not meet the Spire assistance eligibility criteria but were eligible for LIHEAP, the Company provided LIHEAP applications to.

In April, the Department of Social Services also issued a news release extending the LIHEAP application deadline through May 31, 2020. In an effort to communicate with customers about assistance— both LIHEAP and Spire-based options-- Spire took the following measures:

- Continued to reach out to the more than 13,000 customers who applied for assistance to provide help with applying for LIHEAP.
- Recorded and shared a webinar on how to fill out the LIHEAP application.
- Launched social media and traditional media campaigns encouraging our customers to apply for Spire assistance and LIHEAP assistance. Advertising included television, radio search engine marketing, and social media.
- In addition to paid advertising, public service announcements were communicated across radio, television, radio and streaming platforms, and organic social posts were also placed by our company and affiliated partners.
- Sent emails to our agency partners and posted program details on our pledge website for agencies to share with their clients on how to apply.
- Spire representatives participated in 8 radio and television earned media interviews to promote the assistance.
- Finally, program information was also posted on SpireEnergy.com and our customer online portal (My Account), and employees were encouraged to share Facebook posts.

Even with careful planning and promotion, the Company was unable to provide funds to the majority of applicants. This is because most of the applicants had incomes that fell within the LIHEAP federal poverty guidelines of 0-135%, whereas Spire's funding is available only to those customers within 136-185% of the Federal Poverty Level.

Now, a significant portion of those same LIHEAP eligible customers -- who originally did not meet the eligibility criteria for Spire assistance -- are no longer eligible for LIHEAP. (NOTE: As of May 31, 2020, LIHEAP-eligible customers can no longer receive LIHEAP assistance to help cover the costs of their natural gas charges.) And with natural gas service disconnections resuming in July, vulnerable customers impacted by the pandemic, particularly those with past due balances, need assistance now more than ever.

That's why Spire would like to expand the eligibility requirements of the Spire assistance program. Specifically, Spire would like to use low-income affordability funds to help active customers with incomes between **0% - 185% of the Federal Poverty Level**. The Company would also like to extend the program timeline from July 31 to **September 30, 2020**.

As a separate filing is a Motion for Expedited Treatment requesting that these tariffs become effective on July 18, 2020, instead of August 1, 2020, so we may help as many of our customers as soon as possible.

Thank you for bringing this matter to the attention of the appropriate Commission personnel.

Sincerely,

*/s/ Julie Trachsel*

**Julie Trachsel**

**Manager, Community Services Department**