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

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In the Matter of the Establishment of a Working Group and a Working Case for the Re-Writing Of Spire, Inc.'s Cost Allocation Manual, Including its Standards of Conduct, as necessary, For the Commission's Approval

Case No. GW-2018-0367

## SPIRE MISSOURI'S DRAFT COST ALLOCATION MANUAL

**COMES NOW** Spire Missouri Inc. ("Spire" or "the Company"), by and through counsel, and files this draft Cost Allocation Manual ("CAM") for Commission Approval, and in support states as follows:

1. The re-write of Spire's CAM has involved many discussions and numerous correspondence between Spire, the Staff of the Missouri Public Service Commission ("Staff") and the Office of the Public Counsel ("OPC") since the opening of this working case in 2018.

2. In the Company's last rate case, Case No. GR-2021-0108, it was Spire's intention to file a draft CAM before the conclusion of the case. Unfortunately, due to workload of the Parties, finalizing the CAM was not feasible at that time. In the Commission's November 12, 2021 Amended Report and Order in Case No. GR-2021-0108, the Commission ordered Spire to file a draft CAM no later than six-months from the effective date of the Commission's Amended Report and Order. This filing is being made in compliance with that order.

3. The accompanying draft CAM, attached hereto as Exhibit 1, reflects language agreed upon by both Spire and Staff. The OPC has been working with Spire and Staff on the CAM re-write, but were not able to reach a consensus as to all changes in the draft CAM.

4. **WHEREFORE**, Spire respectfully requests that the Commission approve its draft CAM as submitted.

Respectfully submitted,

/s/ Goldie T. Bockstruck

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## ATTORNEYS FOR SPIRE MISSOURI INC.

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted

by facsimile or electronically mailed to all counsel of record this 23<sup>rd</sup> day of May, 2022.

<u>/s/ Goldie T. Bockstruck</u>