

2. A Certificate of Good Standing evidencing Spire Missouri's standing to do business in Missouri is attached hereto as Exhibit 1 and incorporated herein by this reference. The information on such Certificate is currently applicable and correct.

3. 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.

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

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.

DEPRECIATION RATE REQUEST

6. Spire Missouri has recently invested in 10,000 smart meter devices for its residential customers, with installation to begin this fiscal year and plans to continue to invest in smart meters over the next several years. Unlike the Company's current technology which requires the establishment of a link between the meter and reading device and has only one-way communication, the new smart meters consolidate the reading device and the meter within a single unit that allows for new meter reading technology that is capable of two-way communication.

7. Spire Missouri's current authorized plant accounts where the smart meter devices would seemingly fall into, include both meters and communication equipment. For Spire West, the meter accounts currently have a 2.86% annual depreciation rate (35-year life with no net salvage) and for communication equipment (ERT devices) a 5.26% annual depreciation rate (19-year life with no net salvage). Spire East has a 2.37% annual depreciation rate (38-year life with 10% net salvage) for meters, and a 5.0% annual depreciation rate (20-year life with no net salvage) for communication equipment.

8. In order to comply with FERC property classifications and to provide consistency across the Spire Missouri service area, Spire Missouri is establishing two new plant accounts, Account 381.100-Smart Meters and Account 382.100 Smart Meter Installations to place these smart meter devices. Given the different functionality of the new smart meter devices, and the 20-year battery life of the devices, Spire Missouri is requesting a new annual depreciation rate of 5%, based on a 20-year service life and no net salvage.

9. In order for the impact of the new depreciation rate to be reflected in Spire Missouri's financial results for its 2020 fiscal year reporting, the Company requests the Commission issue its order no later than September 30, 2020.

10. Granting the DAO requested herein will not impact customer rates. The DAO would put the Company in a position where it can, in future rate proceedings, request depreciation expense recovery in rates, however, the DAO does not guarantee that such rate recovery will be allowed. The Company will seek recovery of these costs in its next general rate case proceeding.

REQUEST FOR WAIVER

11. 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 has attached to this request a verified declaration 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 its request for a depreciation authority order. For that reason, the Company requests that the Commission grant a waiver of the 60-day notice requirement for Spire Missouri's application for depreciation authority.

WHEREFORE, Spire Missouri, the Applicant herein, respectfully requests that the Commission grant the Company's Application and: (a) issue a DAO authorizing Spire Missouri to utilize an annual depreciation rate of 5.0% for the smart meter assets placed within

Accounts 381.100 and 382.100 by no later than September 30, 2020 (b) waiving for good cause the 60-day notice requirement of 20 CSR 4240-4.017(1)(D); and (c) provide Spire Missouri with such other relief as the Commission finds is necessary and appropriate and not inconsistent with the DAO requested in this Application.

Respectfully submitted,

SPIRE MISSOURI INC.

By: /s/ Goldie T. Bockstruck

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Verified Application of Spire Missouri Inc. was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 25th day of June 2020 by hand-delivery, e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

/s/ Goldie T. Bockstruck

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

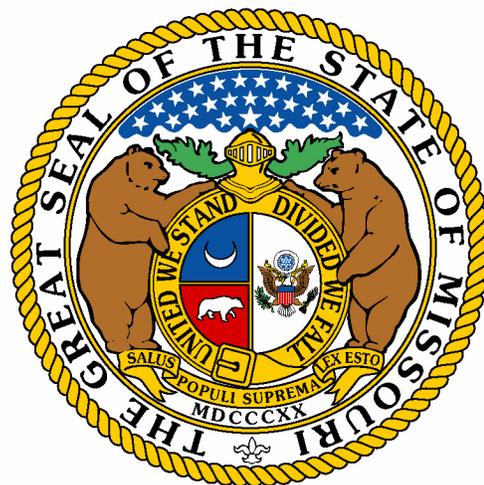
I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

Spire Missouri Inc.
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was created under the laws of this State on the 2nd day of March, 1857, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 24th day of October, 2019.


Secretary of State



Certification Number: CERT-10242019-0025