

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

In the Matter of the Establishment of a Working Case            )  
for the Review and Consideration of a Rewriting and            ) File No. AW-2018-0394  
Writing of Existing and New Affiliate Transaction                )  
Rules and HVAC Affiliate Transaction Rules                        )

**COMMENTS OF SPIRE MISSOURI INC.**

COMES NOW Spire Missouri Inc. (“Spire” or “Company”), on behalf of itself and its operating units, Spire East and Spire West, and submits these comments in response to the Commission’s February 26, 2020 Order Requesting Cost of Compliance Responses.

**COMMENTS**

Spire has reviewed the Missouri Public Service Commission Staff’s (“Staff”) February 18, 2020 revisions to its draft rule in this proceeding and believes that certain provisions of the rule would result in incremental costs related to personnel and information technology (“IT”) costs as the draft rule calls for increased reporting requirements. The requirements should be expected to result in increased discovery and interaction between the Company, the Office of Public Counsel, and Staff. At this time, Spire cannot quantify what amount of incremental costs it may incur but given the Company’s experience in addressing these matters with parties, it may be significant.

Spire would also state that it appears there are still some outstanding issues that have been raised by the parties that have not been addressed by Staff in its latest draft rule revision. Spire continues to support any efforts to address those issues and develop a rule that is agreeable to all parties. Spire would like to recognize Staff’s continued efforts to incorporate or address many of the comments/suggestions that have been provided by the parties and welcomes the opportunity to

discuss further any of the items still outstanding, including the anticipated incremental costs required to comply with the draft rule.

### **CONCLUSION**

In conclusion, Spire believes certain provisions of Staff's February 18, 2020 draft rule will result in incremental costs in order to comply. Spire continues to support the Staff's efforts in this case and looks forward to further discussions on any outstanding issues that may be raised by the parties in this proceeding.

Respectfully submitted,

SPIRE MISSOURI INC.

**By /s/ Goldie Bockstruck**

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of the Public Counsel, on this 20th day of March, 2020 by hand-delivery, fax, electronic mail or by regular mail, postage prepaid.

**/s/ Goldie Bockstruck**