

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

In the Matter of Spire Missouri, Inc. d/b/a)
Spire’s Request for Authority to Implement a) File No. GR-2022-0179
General Rate Increase for Natural Gas Service) Tracking No. YG-2022-0244
Provided in the Company’s Missouri)
Service Areas)

RESPONSE OF
SYMMETRY ENERGY SOLUTIONS, LLC
TO SPIRE’S TARIFF SUSPENSION REQUEST

COMES NOW, Symmetry Energy Solutions, LLC (“Symmetry”), pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.065 as a prospective party with its Application to Intervene pending in this case, and in response to the tariff suspension request. In support thereof, Symmetry states as follows:

1. On April 1, 2022, Spire Missouri Inc. d/b/a Spire (“Spire”) submitted tariff sheets to produce a net increase in gas revenues of approximately \$151.9 million, and to make changes in “any rate or charge, or in any form of contract or agreement, or any rule or regulation relating to any rate, charge or service, or in any general privilege or facility,” as governed by §393.140(11) *Revised Statutes of Missouri*. The tariff sheets bear an effective date of May 1, 2022.

2. On April 4, 2022, the Commission issued its *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, Setting a Deadline to Respond to Spire’s Tariff Suspension Request, and Directing a Proposed Schedule*, which set a deadline of April 15, 2022 for responses to Spire’s tariff suspension request.

3. This Commission acknowledged in its Order that “Spire asks that the Commission not suspend the tariff for the six months beyond the 120 days provided for in

section 393.150.1 RSMo. In support of its position, Spire asserts that there will be a limited number of contested issues,” and thus this Commission ordered “any responses to Spire’s request” to be filed no later than April 15, 2022.

4. Symmetry, a natural gas marketer, sells natural gas to customers who are on Spire’s system pursuant to Spire’s transportation tariff.

5. Symmetry filed this same day its Application to Intervene, which Application is pending at the time of this filing.

6. In its pending Application to Intervene, Symmetry set forth these multiple, significant changes that Spire proposes to its current tariff: (1) require telemetry for many of Symmetry’s customers which will result in additional costs for many customers and perhaps be unaffordable for many small businesses; (2) permit Spire total discretion to solely determine an “acceptable” delivery point for each of Symmetry’s customers; (3) require unnecessarily onerous and expensive credit documentation; (4) require Symmetry to submit to this Commission’s jurisdiction and supervision; (5) permit Spire to immediately suspend or revoke Symmetry’s right to provide service under Spire’s tariff; (6) shorten the deadlines for Symmetry’s and its customers’ nominations; (7) increase some charges to Symmetry and its customers; (8) permit Spire to physically disconnect the flow of gas to Symmetry’s customers; (9) permit Spire to provide less than 24 hours’ notice of an OFO or POC of undetermined duration; (10) deny this Commission’s Due Process procedures to Symmetry and its customers by requiring full payment of all disputed penalties as a condition precedent to seeking this Commission’s review of Spire’s calculation and imposition of penalties; (11) require undefined 24 hour on-call “technical staff;” and (12) immediately cause Symmetry to lose at least 200 of its current customers.

7. The revised thresholds and requirements proposed by Spire will limit the ability of marketers such as Symmetry to offer customers natural gas alternatives to Spire and will invariably and greatly increase natural gas costs for Missouri customers.

8. As detailed in Paragraph 6 above, Symmetry's and its customers' interests in the multiple changes Spire proposes in its tariff are significant and likely to be contested issues in this case because Symmetry wishes to ensure that both its and its customers' interest in affordable and reliable natural gas are preserved for the future, that Symmetry and its customers have the ability to appropriately plan for the future, and that Symmetry and its customers are not disadvantaged – economically or otherwise – by Spire's current proposed tariff changes.

9. Therefore, contrary to Spire's assertion, multiple issues will likely be contested in this case and it will not be possible to conclude this Commission's Due Process procedure and hearing within only the 120 day period of suspension requested by Spire. Symmetry thus requests this Commission to exercise its discretion under §393.150.2 *Revised Statutes of Missouri* to extend the time of suspension for a further period of six months beyond the 120 day suspension period requested by Spire.

WHEREFORE, Symmetry prays that this Commission issue an order granting the full statutory suspension period of eleven months/330 days in this case, and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Peggy A. Whipple
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***ATTORNEYS FOR SYMMETRY
ENERGY SOLUTIONS, LLC***

Certificate of Service

I hereby certify that on this 15th day of April, 2022, a copy of the foregoing **Response of Symmetry Energy Solutions, LLC to Spire's Tariff Suspension Request** has been served on all parties on the official service list for this matter via filing in the Commission's EFIS system and/or email.

/s/ Peggy A. Whipple
Peggy A. Whipple