

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

In the matter of the Application of Spire Missouri)
Inc. for a Temporary Variance from Rule and)
Tariff Provisions Relating to Late Payment Fees) Case No. GA-2020_____
And Disconnection Rules and Motion for)
Expedited Treatment)

**SPIRE MISSOURI INC.’S APPLICATION FOR A
TEMPORARY VARIANCE FROM RULE AND TARIFF PROVISIONS
RELATING TO LATE PAYMENT FEES AND DISCONNECTION RULES
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), on behalf of its operating units, Spire Missouri East (“Spire East”) and Spire Missouri West (“Spire West”) and, pursuant to Commission Rules 20 CSR 4240-2.060(4); 20 CSR 4240-2.205; and 20 CSR 4240-13.065 files this Application for a Temporary Variance from Rule and Tariff Provisions relating to late payment fees and disconnection rules and Motion for Expedited Treatment. In support thereof, Spire Missouri respectfully states as follows:

1. Spire Missouri is a public utility and gas corporation incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri 63101. 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.

2 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.

3. Communications in regard to this Application should be addressed to the persons below:

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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.

APPLICATION FOR VARIANCE

6. As this Commission is well aware, the current Coronavirus (COVID-19) pandemic in confronting the world and the United States with a variety of fundamental and even unprecedented health, economic and social challenges. A number of governmental and private sector measures aimed at restricting travel, crowd sizes, the operation of schools, businesses, and churches as well as sporting and other events have been implemented in an effort to mitigate the spread and impact of COVID-19. As a consequence of these measures, many of the Company's

customers are being forced to stay at home for lengthy periods of time and avoid work, social gatherings and other interactive activities.

7. As these events unfold, the Company is committed to avoiding any utility-related actions that would impair the ability of its customers to remain in their homes or obtain vital services and thereby help mitigate the spread of COVID-19. To that end, the Company is temporarily suspending any disconnection activities relating to residential or commercial service. The Company is also proposing to waive any late payment charges that might accrue for service provided on and after March 1, 2020. As reflected on the revised tariff sheets filed on this same date, these measures would continue in effect through May 1, 2020 unless extended through a subsequent tariff filing.

8. To facilitate these actions, Spire Missouri respectfully requests that the Commission grant it a temporary variance from any of the disconnection provisions set forth in the Commission's rules (see 20 CSR 4240-13.050 and 4240-13.055) and the Company's tariffs (see R-5 and R-11 of the Rules and Regulations for Spire East and Spire West) that might be construed as requiring that service be discontinued under these circumstances. The Company further requests that the Commission grant a variance permitting Spire East and Spire West to forego the assessment of late payment charges for service rendered between March 1, 2020 and May 1, 2020 under their respective Rate Schedules RS, SGS, LGS and LV Rate Schedules (see tariff sheets nos. 2-5).

MOTION FOR EXPEDITED TREATMENT

9. Given the exigencies of the COVID-19 pandemic and the need to implement on a timely basis measures for mitigating it, the Company submits that there is good cause to approve this application on an expedited basis and respectfully requests that the Commission approve it and the companion tariff filing filed on this same date by no later March 26, 2020.

10. Spire Missouri submits that harm will be avoided by expedited approval of the application by permitting these mitigation measures to be fully implemented on a timely basis. At

the same time, there will be no negative impact on other customers or the general public if the Commission grants such relief. For all of these reasons, Spire Missouri submits that there is good cause for the Commission to approve its application and companion tariff sheets no later than March 26, 2020.

11. This pleading was filed as soon as it could have been following the Company's formulation of this initiate for helping its customers in this time of need.

12. Spire Missouri has discussed this application for a variance with the Commission Staff and the Office of the Public Counsel and both parties have indicated that they have no objection to the relief requested herein.

WHEREFORE, for the foregoing reasons, Spire Missouri, Inc. respectfully requests that the Commission grant the variance and motion for expedited treatment as described herein.

Respectfully submitted,

/s/Goldie T. Bockstruck

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been duly served upon the General Counsel of the Staff and on the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 16th day of March, 2020.

/s/ Goldie T. Bockstruck _____