

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

In the Matter of the Application of Spire )  
Missouri, Inc. for a Certificate of )  
Convenience and Necessity to Construct, )  
Install, Own, Operate, Maintain, and ) Case No. GA-2023-0038  
Otherwise Control and Manage a Natural )  
Gas Distribution System in and around the )  
City of Oronogo in Jasper County, )  
Missouri as an Expansion of its Existing )  
Certified Areas. )

**SPIRE MISSOURI INC.’S RESPONSE TO  
STAFF RECOMMENDATION FOR APPROVAL OF  
CERTIFICATE OF CONVENIENCE AND NECESSITY**

Spire Missouri Inc. (“Spire Missouri” or “the Company”) respectfully submits this Response to Staff Recommendation for Approval of Certificate of Convenience and Necessity (“Recommendation”) as follows:

1. On August 5, 2022, Spire Missouri submitted its Application for a Certificate of Convenience and Necessity and Request for Waiver (“Application”). Spire Missouri’s Application requested a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage the City of Oronogo, Missouri’s (“Oronogo” or “the City”) natural gas distribution system. The Application also asked the Missouri Public Service Commission (“Commission”) to waive the sixty (60) day notice requirement of Commission Rule 20 CSR 4240-4.017(1).

2. The Staff of the Missouri Public Service Commission (“Staff”) requested an extension to review Spire Missouri’s proposed acquisition of Oronogo, issue data requests, and review the Company’s data request responses, which the Commission granted on September 22, 2022. Staff thereafter submitted its complete Recommendation on December 20, 2022.

3. Staff agrees that good cause exists to waive the notice requirements of 20 CSR 4240-4.017(1) and recommends that that the Commission approve Spire Missouri's Application for a CCN, subject to the following conditions:

- Reserve all rate-making determinations for the revenue requirement impact of acquiring Oronogo's natural gas distribution system until the Company's next general rate-making proceeding;
- Require Spire Missouri to provide updated legal descriptions of the area subject to the requested CCN consistent with the Missouri Department of Transportation Highway Map used as a reference for the Application; and
- Require Spire Missouri to file a revised tariff sheet to incorporate the original legal descriptions for the City's boundaries and any updated descriptions for all property served by Oronogo's distribution system consistent with Staff's second recommended condition.

4. No party has objected to Staff's Recommendation.

5. Spire Missouri has reviewed Staff's Recommendation and the Company has no objection to the Commission approving the Application subject to Staff's three (3) recommended conditions. Spire Missouri intends to supply a revised tariff sheet and updated legal descriptions of the areas served by Oronogo's distribution system within thirty (30) days after the issuance of a Commission order approving the Application subject to Staff's recommendations.

**WHEREFORE**, Spire Missouri requests that the Commission issue an order approving the Application subject to Staff's requested conditions, directing Spire Missouri to file a revised tariff sheet with updated land descriptions of the area covered by the CCN used to serve in and

around Oronogo within thirty (30) days, and granting such other relief as the Commission deems just and proper.

Respectfully submitted,

*/s/ J. Antonio Arias*

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**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record on this 6th day of January, 2023.

*/s/ Lew Keathley*

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Lew Keathley