

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

In the Matter of the Application of Spire )  
Missouri Inc. to Establish an Infrastructure )  
System Replacement Surcharge in its Spire ) **File No. GO-2018-0309**  
Missouri East Service Territory )

In the Matter of the Application of Spire )  
Missouri Inc. to Establish an Infrastructure )  
System Replacement Surcharge in its Spire ) **File No. GO-2018-0310**  
Missouri West Service Territory )

**SPIRE MISSOURI INC.'S  
NOTICE OF INTRODUCTION OF ADDITIONAL EVIDENCE**

COMES NOW Spire Missouri Inc., on behalf of itself and its two operating units, Spire East and Spire West (“Spire” or “Company”), and files this Notice of Introduction of Additional Evidence, stating as follows:

1. On April 29, 2020, the Commission issued an *Order Setting a Procedural Schedule Including a Limited Hearing on Remand* in these cases (the “April 29 Order”). Page 3 of the April 29 Order limited the testimony to be filed in these cases to pointing to testimony that is already in the record. The Commission rejected Spire’s request to provide new testimony showing that its cast iron and bare steel facilities are worn out or in a deteriorated condition.

2. For the reasons set forth in Spire’s April 22 position statement and its May 7 motion for reconsideration of the April 29 Order and request for oral argument, Spire asserts that the April 29 Order violates Spire’s right to due process. Pending the Commission’s ruling on Spire’s May 7 pleading, Spire is exercising its right, pursuant to Commission Rule 2.130 and §536.070 RSMo., to make an offer of proof for the Commission’s consideration showing that Spire’s cast iron and bare steel pipes are worn out or in a deteriorated condition.

3. Spire is providing this notice as a courtesy to the Commission and the parties that

such evidence is being offered, as contemplated by the Commission's April 29 Order, which states "Spire Missouri may prepare and pre-file evidence that it believes it would need to make an offer of proof" (p. 3).

4. In connection with this additional evidence, Spire has retrieved samples of cast iron and bare steel pipe from projects included in these cases. The samples currently reside at the Company's service center at 4118 Shrewsbury Avenue, near I-44 in Shrewsbury, Missouri. Spire welcomes any party and its experts, and any member of the Commission, to view these materials at the Shrewsbury Service Center. Please contact Goldie Bockstruck at the number below to arrange for a viewing. Appropriate COVID-19 precautions will be observed.

**WHEREFORE** Spire Missouri Inc. respectfully requests that the Commission accept this Notice and the testimony filed today in the above referenced cases.

Respectfully submitted,

**/s/ Matthew Aplington**

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**/s/ Goldie T. Bockstruck**

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**/s/ Michael C. Pendergast**

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**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing has been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 13th day of May, 2020.

**/s/ Goldie T. Bockstruck**