

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

In the Matter of the Application of Spire Missouri)
Inc. for approval to establish an On-Bill Financing) Case No. GO-2021-
Program and Cost Recovery Mechanism)

**VERIFIED APPLICATION OF SPIRE MISSOURI INC. FOR APPROVAL TO
ESTABLISH AN ON-BILL FINANCING PROGRAM AND COST RECOVERY
MECHANISM FOR IT'S MISSOURI SERVICE TERRITORY AND REQUEST
FOR WAIVER FROM 60 DAY NOTICE RULE**

COMES NOW Spire Missouri Inc., pursuant to 20 CSR 4240-2.060 and 2.080 of the Rules of Practice and Procedure of the Missouri Public Service Commission (“Commission”) and, for its application seeking approval of a new tariffed program, an on-bill financing program, and an associated cost recovery mechanism for the recovery of Spire’s On-Bill Financing Program investments, which are aimed at facilitating expanded opportunities for customers to benefit from cost-effective energy efficiency measures, respectfully states as follows:

THE APPLICANT

2. Spire Missouri Inc. 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's standing to do business in Missouri was submitted in Case No. GU-2020-0376 and is incorporated by reference herein for all purposes. The information in such Certificate is current and correct.

3. Spire Missouri Inc. is engaged in the business of distributing and transporting natural gas to customers in Missouri as a gas corporation subject to the

jurisdiction of the Commission. Spire provides gas service in Missouri to customers in the City of St. Louis and the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, St. Genevieve, St. Francois, Madison, Butler, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Cooper, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Newton, Pettis, Platte, Ray, Saline, Stone, and Vernon.

4. Communications in regard to this Application should be addressed to:

Matthew Aplington MoBar#58565
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5. Other than cases that have been docketed at the Commission, Spire 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.

6. Spire Missouri is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

SPIRE ON-BILL FINANCING PROGRAM

7. Spire's On-Bill Financing Program, which is modeled after the Pay as You Save (PAYS®) Program, is designed to give all residential customers who can benefit from energy efficiency measures, the ability to obtain these measures while also saving on their natural gas bill. Unlike Spire's current financing programs, which require customers to pass a credit check in order to be eligible for financing, Spire's On-Bill Financing Program eliminates this requirement. This difference will allow more customers to take advantage of cost saving energy efficiency measures.

8. Spire is also requesting approval of a new cost recovery mechanism, which would allow the Company to recover costs associated with on-bill financing Program investments. The Company's proposal includes an annual filing to true up Program costs.

9. With this application, Spire is filing tariff sheets reflecting the terms and conditions and cost recovery elements of its proposed Spire On-Bill Financing Program. Also filed concurrently with this application are the direct testimonies of Shaylyn Dean and Wesley Selinger which provide a program overview and a description of the Company's proposed cost recovery mechanism.

REQUEST FOR WAIVER

10. Commission Rule 20 CSR 4240-4.017(1) provides, in part, as follows:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission

and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

Rule 20 CSR 4240-4.017(1)(D) permits a party to request a waiver of the above cited rule for good cause. The rule provision specifically provides that good cause may be established by submitting a verified declaration that the filing party has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. The Company interprets this to mean that good cause is established if the filing party has had no communication with a member of the office of the Commission outside of pleadings or other public communications. Subject to that understanding, the Company has attached to this request a verified declaration that neither the Company nor any person or entity acting on behalf of the Company or its Missouri operating units, has had a communication with a member of the office of the commission in the last 150 days regarding any substantive issue relating to this case. For that reason, the Company requests that the Commission grant a waiver of the 60-day notice requirement for Spire Missouri's application.

WHEREFORE, pursuant to 20 CSR 4240-2.060 and 2.080 of the Rules of Practice and Procedure of the Commission, Spire Missouri respectfully requests that the Commission issue an Order, approving the tariff sheets filed with this application for the proposed Spire On-Bill Financing program and cost recovery mechanism and approve the Company's requested waiver from the 60 day filing requirements contained in 20 CSR 4240-4.017(1).

Respectfully submitted,

Goldie T. Bockstruck

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Application and Petition was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 30th day of October, 2020 by hand-delivery, fax, electronic or regular mail.

/s/Goldie T. Bockstruck

Goldie T. Bockstruck

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VERIFICATION AND AFFIDAVIT OF WESLEY E. SELINGER

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

Wesley Selinger, of lawful age, being first duly sworn, deposes and states:

1. My name is Wesley Selinger. I am the Manager of Rates and Planning. My business address is 700 Market St., St. Louis, Missouri, 63101.

2. I have read the foregoing Application, and that the matters and things set forth therein are true and correct to the best of my knowledge, information and belief. I also hereby swear and affirm that I have read the foregoing Request for Waiver, and hereby declare that, other than pleadings or other public communications, Spire Missouri Inc. has had no communication with the office of the Commission, within the prior one hundred and fifty (150) days regarding any substantive issue likely to be in the above referenced case.

3. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 30, 2020

/s/ Wesley Selinger
Wesley Selinger