Exhibit No.:	
Issue:	**Rule Changes**
Witness:	**Scott A. Weitzel**
Type of Exhibit:	**Supplemental Direct Testimony**
Sponsoring Party:	**Spire Missouri Inc.**
Case No:	**GR-2021-0108**
Testimony Date:	**March 12, 2021**

SPIRE MISSOURI INC.

CASE NO. GR-2021-0108

SUPPLEMENTAL DIRECT TESTIMONY

OF

SCOTT A. WEITZEL

SUPPLEMENTAL DIRECT TESTIMONY OF SCOTT A. WEITZEL

RULE CHANGES

Q. WHAT IS YOUR NAME AND BUSINESS ADDRESS?

A. My name is Scott A. Weitzel and my business is 700 Market Street, St. Louis, Missouri 63101.

Q. WHAT IS YOUR CURRENT POSITION AT SPIRE MISSOURI INC.?

A. I am the Managing Director of Regulatory and Legislative Affairs for Spire Missouri Inc. ("Spire" or "Company").

Q. HAS THE COMPANY PROPOSED ANY MODIFICATIONS TO THE RULES AND REGULATIONS?

A. Yes. The Company proposed several clean up edits and updates throughout the Rules and Regulations filed with its Direct Testimony on December 11, 2020. Several of these edits were to simply bring outdated language current, either from an economic standpoint or to reflect changes in customer rate classes. Many of Spire's proposed modifications were made to create consistency throughout the document and to finish transitioning language from the two legacy companies into one Spire Missouri Inc. Additionally, some of these proposed changes were meant to make the Rules and Regulations, consistent, clear, and aligned with the language found in Commission Rule 20 CSR 4240-13 ("Chapter 13"). Finally, some of these proposed changes provide more flexibility for the Company to continue to provide excellent customer service and benefit the consumer with more clear rules and regulations. See the summary table below for the list of rule changes included in my supplemental direct testimony:

Tariff Sheet Title and No.	Paragraph	Name of Tariff /General Provision
R-6.3, R-6.4	B	Rendering and Payment of bills
R-7	7	Automated Meter Reading Opt-Out Choice (formerly Adjustment for Heat Content)
R-8, 8.3	9, 11	Resale, Meter Testing and Billing Adjustments, Piping Equipment
R-9		Customer Liability
R-11.4	G	Discontinuance of Service
R-13	A	Reconnection and Company Inspection of Customer Premises
R-15.1	D	Extension of Distribution Facilities
R-17	21.1	Curtailment
R-18	23	Meter Reading, Collection Trip and Non- Access
R-19		Insulation Financing Program
R-23	A(1)	Promotional Practices
R-24		Budget Billing Plan
R-25	30	Usage Estimation Procedure
R-30.12		Conservation and Energy Efficiency Programs
R-32, 32.1		Economic Development Rider
R-33		Negotiated Gas Service Rider

Q. WHY IS THE COMPANY FILING SUPPLEMENTAL DIRECT TESTIMONY CONCERNING ITS PROPOSED MODIFICATIONS TO THE RULES AND REGULATIONS?

A. During recent discussions with the Commission Staff regarding the Company's proposed Combined Heat and Power ("CHP") and Carbon Neutral programs, along with related discovery, we felt that the provision of supplemental direct testimony concerning Spire's proposed modifications to its Rules and Regulations would result in a more comprehensive record in this proceeding.

Q. WILL YOU PLEASE EXPLAIN HOW YOUR SUPPLEMENTAL DIRECT TESTIMONY IS ORGANIZED?

A. Yes. The Company's proposed modifications to its rules generally fall into four categories:

(1) Rule modifications that provide clarity, consistency or flexibility to the consumer;

(2) Rule modifications to ensure Spire maintains compliance with Chapter 13;

(3) Rule modifications to continue the Company's efforts to consolidate its legacy MGE and Laclede tariffs into one Spire; and

(4) Rule modifications to either update rules to reflect current economics or to reflect changes to Spire's rate classes.

To the extent a proposed rule modification would fall into more than one of the above categories, that will be noted in the discussion below.

I. Rule Modifications to Provide Clarity, Consistency or Flexibility to Consumers

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 3.

A. In Sheet No. 3, Section 1, "Definitions", the Company proposed adding definitions for "business day" and "working day" defining both as "Monday through Friday, excluding holidays," and the proposal makes these terms interchangeable. This change provides clarity and allows consistent application when working with customers or managing scheduling within the Company. These changes are reflected on Sheet Nos. R-3. and R-3.3.

The Company also proposed editing the definition of "Due Date" on Sheet No. R-3.1 to add, "This is the same as delinquent date." Commission Rule 20 CSR 4240-13.020(9) requires the due date and delinquent date, if different. Spire wants to have one date on a customer's bill and prefers the term "delinquent date" to be on the bill, so this proposed change adds to the definition of "due date" to make it clear that those dates are the same, as permitted by Chapter 13.

The Company has also proposed an edit to the definition of "Extension Agreement" on Sheet No. R-3.1 by removing the reference to "due date" and the fifteen-day limitation, while leaving "delinquent date" in place. As explained above, the Company plans to use delinquent date, so use of the term due date is unnecessarily duplicative. The other proposed modifications allow the Company greater flexibility to work with customers based on each customer's specific situation with a hard timeline.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 5.

A. On Sheet No. R-5, "Applications," the Company proposed deleting, "The customer will elect which of the applicable rates is best suited to his requirements. Upon request, the Company will assist the customer in making such election." This proposal was made because the language is not required by any of the Commission Rules. The Company's rate classes has been reduced over time and as a result, the Company has made adjustments to its rate classes. During the Company's last rate case there were provisions put in several rate tariffs specifying volumes and a corresponding rate class offering. This is adjusted annually. This proposed modification removes the burden of selection from the consumer and places it back on the Company. The Company can then utilize the requirements set forth in its tariff to prescribe the appropriate rate class to its customers..

Q. DID THE COMPANY MAKE ANY OTHER MODIFICATIONS TO RULE 5?

A. Yes. In the "Deposits" section the Company proposed a few changes. On Sheet No. R-5.1 (3), the Company proposes to delete "724 or below" and to add "lower than an acceptable score with the Company's credit scoring agency or its own internal payment scoring system." Commission Rule 20 CSR 4240-13.030 (1)(c) permits a utility to require a deposit or other guarantee as a condition of new residential service if the applicant is unable to establish an "acceptable credit rating under standards contained in the utility's commission-approved tariff." The current language includes a very specific Equifax Advanced Energy Risk Score, which is not required under Commission Rules. The Company's proposal provides a more general description of that score and one that allows for flexibility for the Company and customers while maintaining compliance with Chapter 13.

Under Section D (1) Sheet No. 5.2, the Company added "two (2) times the highest bill or" because that language is used in Commission Rule 20 CSR 4240-13.030 (4)(A). Similarly, on Sheet No R-5.3, Section (D)(6), the Company added "within five (5) years following the date that the customer is due for a deposit return" to make the Company's language consistent with Commission Rule 20 CSR 4240-13.030(4)(G). Finally, on Sheet No. R-5.3 (8), the Company added "because of prior unauthorized interference or diversion of service" to better incorporate Commission Rule 20 SR 4240-13.030(I) into the Company's Rules and Regulations.

On Sheet No. R-5.4, the Company added "two (2) times the highest bill or" because that language is used in Commission Rule 20 CSR 4240-13.030(4)(A) and the Company believes it provides more guidance to the customer and the Company. Finally, under "Interest Rate", the Company deleted "Only 3% per annum" and added "equal to the prime lending rate minus two percentage points, but not less than zero, as published in the Wall Street Journal for the last business day of the preceding calendar year, compounded annually." This language allows the interest rate to be more current with economic times and gives a direct source and support for using that interest rate. This provision is also in the PGA tariff Sheet 11.8.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 8.

A. In Sheet No. Rule 8, paragraph 9, the Company is proposing to change "shall to "may" and added "or (2) gas resold or sub-metered at no mark-up, with prior consent of the Company." The Company has had requests from real estate developers or multi-family dwelling building managers to permit the sub-metering of natural gas. This rule change allows the Company to accommodate natural gas usage in certain multi-family developments where it is only practical to have one meter. The added language ensures that such installations occur only with the Company's permission, where they can be accomplished safely, and also ensures that end users are not charged any mark-up on the re-metered gas. These requests are infrequent and may only apply to a couple of unique cases. In practice, the Company does not want to encourage or promote resale or sub meter at no mark up. In Sheet No 8.3, paragraph 11, the Company proposed to change "shall" to "may" in order to give the Company discretion as to when to perform work on customer piping and equipment. This change allows for scheduling flexibility, discretion as to the amount of work involved, and credit approval of the customer.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 9.

A. On Sheet No. R-9, the Company is proposing to add language to provide that at least annually, the Company shall attempt to secure an actual meter reading from customers reporting their own usage, and if customer fails to report usage to the company, the Company will obtain a meter reading at least annually. This language is consistent with Commission Rule 20 CSR 4240-13.020(3). The additional proposed language to Sheet R-9 provides that the Customer shall be solely responsible for the operation, maintenance, and repair of his piping and appliances beyond the meter outlet, and the Company shall have no liability to Customer or any third party for operation, maintenance or repairs beyond the meter outlet. This additional language more explicitly informs customers that the Company's piping maintenance obligations, and corresponding legal duties, are determined by facility ownership. The Company believes this clarification will help reinforce the importance for Customers to maintain their customer-owned piping and appliance.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 11.

A. In Sheet No 11.3 and 11.4, the Company changed "from 48 hours to 96 hours" to "at least 24 hours." This change was made based, in part, on language found in Commission Rule 20 CSR 4240-13.050(5) and (8). This language gives the Company more flexibility to give earlier notice of a potential disconnection. The Company believes 24 hours' notice may be appropriate in some situations, however, as an alternative, the Company proposed amending the language in Sheet No 11.4. The proposed amendments state, "The Company will mail, to all residential customers whose account is in jeopardy of termination on the disconnection date, a notice mailed so that normal postal delivery will be made to the customer at least 48 hours preceding potential discontinuance of service."

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 19.

A. The Company has proposed to add "vermin infestation in the attic that affects the integrity of the improvements" as part of Sheet No. 19 "Insulation Financing Program." The language around financing for remediation of vermin infestation in the attic was added because of the effects on the integrity of the insulation improvements. The Company added this language after hearing direct feedback from some of our Natural Gas Contractor Network partners which provide insulation financing to our customers. The Company added this because this is an issue that would impact the energy efficiency of customers making this investment in their homes. The attic has an important role in regulating the heating, as well as cooling, comfort levels of a customer's home. If vermin compromise this space, a customer's energy efficiency and comfort levels become compromised as well. A customer could see larger energy bills due to losing the efficiency achieved by the insulation for not correcting this issue during the installation. Permitting this work to be financed by the customer offers greater flexibility to the customer and clarifies that any work financed to address vermin infestation is intended to not exceed the scope of a minor repair.

Q. PLEASE EXPLAIN THE PROPOSED CHANGES TO RULE 23.

A. The Company proposed to add, "or landlords renting to residential and commercial customers of the Company" and added "tenant" and "plumbers" to the language of Rule 23, the EnergyWise Dealer Program. The Company added the landlord and tenant language to clarify that the EnergyWise Program provides financing to eligible residential and commercial owners of premises served by the Company, regardless of whether the owner occupies that premise. It is common for a gas account to be in the name of the tenant, rather than the landlord, so the Company proposed these changes to provide further clarification on eligibility for the program.

Q. PLEASE EXPLAIN THE PROPOSED CHANGES TO RULE 25.

A. In R-25, the Company deleted a large portion of the Usage Estimating Procedure because it was complex in its wording and the formula was not helpful in implementation. The more streamlined version the Company proposed is easier for customers to understand and calculate and offers flexibility to the Company. The proposed changes also align with 20 CSR 4240-13.020(2)(C)(1), which requires that a utility that has an estimating procedure in its filed and commission-approved tariffs shall follow that estimating procedure, so the Company proposed such a procedure in its filing.

Q. PLEASE EXPLAIN THE PROPOSED CHANGES TO RULE 30.

A. The Company proposed several changes in this tariff to Rule 30. Spire witness Shaylyn Dean provided explanation of this in his direct testimony, pages 3-6. Based on discussions with Staff during the discovery process, the Company is providing additional information in support of these modifications. The Company has proposed changes to the Conservation and Energy Efficiency Programs, Sheet No. R-30.7 and Sheet No. R-30.12. The changes to Sheet No. 30.7 are designed primarily to help our C&I customers move forward with both custom and audit projects. After a discussion with our 3rd party implementer Applied Energy Group (AEG) we decided to reduce the payback requirement and project buydown from two years to one year to help our C&I customers that are considering energy efficiency projects. Reducing the payback period aligns with the Ameren Missouri C&I custom program which also calls for a simple payback to be greater than a 12-month period. The Company is proposing the energy audit changes to make it easier for Non-Profit and all other C&I customers to pursue professional energy audits of their buildings by increasing the audit incentive and then providing a bonus once customers take action and complete a rebate qualifying energy efficiency recommendation from the audit. In R-30.12, the Company is proposing "any unspent or carryover energy efficiency program portfolio funds will be made available for current and/or new programs in the following years."

Currently, the Company can only roll over unspent funds from the Multi-Family Low Income Program sub-budget in the following year. Expanding the use of unspent funds to the entire suite of energy efficiency programs provides the Company with an opportunity to develop and fund new programs for the following year, which should provide more flexibility and benefit to the consumer. The energy efficiency budget is calculated by looking at the rolling average of the Company's gross operating revenues for the previous three years, such that, in some years, the budget is reduced. Any new programs would still need regulatory approval for implementation. Successful programs currently in operation would have access to additional funds and be protected from the same potential budget constraints.

Q. PLEASE EXPLAIN THE PROPOSED CHANGES TO RULE 32.

A. The Company has proposed updates to the Economic Development Rider, including changing rate discount percentages. The Company has proposed the following in regard to Rate Discount: "With respect to the qualified volumes, the commodity or volumetric margin of the sales or transportation rate will be discounted by an average annual amount of 40% (currently 20%), provided that such discount shall not exceed 50% (currently 30%) during any contract year." These incentives were designed to encourage program participation.These modifications also bring the program threshold requirements in line with Spire Missouri's peer electric utilities. Please see Union Electric Company tariff sheet 86.2 The Company currently has very limited participation in the program and believes adjusting these requirements will make the program more viable and more attractive to its customers. This rider still has the same revenue limitations or "caps" for this rider as stated in proposed Sheet 32.1 section D, part 3: "The total dollar amount of the incentives provided under this rider EDR shall not exceed one percent (1%) of the Company's jurisdictional gross revenues during each calendar year; provided, however, the Company shall have the right at any time and for good cause shown to seek a modification of this limitation upon application to the Commission."

II. Rule Modifications to Maintain Compliance with Commission Rule 20 CSR 4240-13

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 6?

A. Consistent with the rationale for the deletion of the term "due date" in other Rules, as discussed herein, throughout Sheet No. R-6, "Rendering and Payment of Bills," the Company deleted the term "due date", since the Company plans to use "delinquent date" on its bills. Under Section A (2)(c) the Company deleted "under no circumstances shall" and added "shall not" so that this language is consistent with Commission Rule 20 CSR 4242-13.020(c)(3). The Company also proposed adding "except by agreement with the customer" to create an exception that allows the Company to better meet the needs and desires of its customers on an individual basis. This proposed rule change therefore provides more flexibility for the consumer and permits the Company to maintain compliance with the Commission's rules.

On Sheet No. R-6.3, the Company proposed to add language to the type of taxes included and to allow flexibility for billing. The Company also removed the phrase "requires supervisory approval" for modification of questionable meter readings. Similarly, on Sheet No. R-6.4, the Company removed the requirement of supervisory approval to promote efficiency and flexibility in serving the customers. The Company further proposed clean up language regarding notice on the bill. Finally, the Company removed a paragraph that discussed a third modification, which stated that such modification was prohibited.

The Company proposed these modifications because it wanted to eliminate a manual review process. Previously, the representative would review an account, enter an office estimate (modification), and then the account/office estimate would then need to be reviewed by a supervisor prior to transitioning back to the representative to bill the customer. The process proposed by the Company is far more efficient. The deleted paragraph is not required by Chapter 13, and since third modifications are not allowed by this paragraph the Company believed it was better to remove it from the Rule altogether.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 18.

A. The Company changed "will" to "may" in paragraph 23, Sheet No. R-18, Collection Trip Charge. This change is consistent with 20 CSR 4240-13.050(12) which provides that a utility may charge the customer a reasonable fee for restoration of service if permitted in the utility's tariff. This language provides flexibility to both the Company and to the customers.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 22.

A. The Company made changes to Rule 22 "Cold Weather Maintenance" in order to be consistent with Chapter 13 and within the Company's Rule. These changes included adding "registered elderly or disabled" to Sheet No. 22 and changing Missouri Family Support Division to Division of Family Services on Sheet No. 22.1, to better match 20 CSR 4240-13.055 (3)(E).

III. Proposed Modifications to Continue the Transition to One Spire Missouri

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 7.

A. As discussed in depth in the Company's application in this proceeding, in Spire's last rate case for legacy Laclede and MGE (GR-2017-2015) Spire began the transition to one Spire Missouri Inc. As such, there was a consolidation of rules and regulations for both service territories. The Company proposed changing the name of Sheet No. R-7 from "Adjustment for Heat Content (formerly applicable to Spire East Only)" to "Automated Meter Reading Opt-Out Charge." This change further brings the Rules and Regulations under one Spire Missouri Inc. Further, this Rule allows residential customers the option to refuse the installation of remotely-read metering, or to request the removal of previously installed remotely-read metering. In these circumstances, standard metering equipment will be installed that requires a manual meter read. The proposed modifications to Rule 7 provide a mechanism for the Company to bill customers who desire a manual meter read. The Company also proposed a modification to this Rule to no longer adjust BTUs. The Company is proposing to use CCF as the unit of measure. This proposal is similar to opt-out provisions currently approved by the Missouri Public Service Commission for electric utilities.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 13.

A. On Sheet No R-13, the Company proposes to delete paragraph 16 A: "When gas is being supplied to any customer, and Company receives notice that such customer intends to vacate the premises occupied, the Company shall promptly, but in no event later than four days (excluding Sundays and holidays) following such vacation, or if said notice of vacation is received by Company after date of vacation, Company shall promptly, but in no event later than four days (excluding Sundays and holidays) following date of said notice, shut off the gas supply to the premises; provided, however, that Company may continue gas supply to the premises if requested by the succeeding customer. The owner or other person in charge of such premises shall make access to the premises available to Company at all hours between 8:00 a.m. and 5:00 p.m. or at any time in case of emergency, so that such cut off may be made. Also, in the former paragraph 16 B, the Company proposes to delete, "at all hours between 8:00 a.m. and 5:00 pm."

Legacy MGE did not have the current Sheet No. R-13, 16 A provisions included under "Company Inspections", which further supports the Company's proposed modification. Another reason the Company removed 16A is because it is not applicable to the Company's inspections. The Rule was therefore not appropriate for this section of the Rules and Regulations. The Company deleted the specific hours to match the changes in R-3 definitions of "work day" and "business day" and this deletion allow more flexibility to serve the customers. The Company has found through experience that the legacy MGE rule results in fewer unnecessary shut-offs. This provides significant additional convenience for customers, and reduced cost to the Company

IV. Proposed Modifications to More Accurately Reflect Current Economics or Revisions to Rate Classes

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 15.

A. In Sheet No. R-15.1, Section 19 C, the Company proposed to delete, "Overhead construction costs include administrative and general salaries and expenses, charges for injuries and damages, pensions, and other fringe benefits. Overheads transferred to construction are determined based on the percentage that construction payroll bears to total payroll and are distributed to construction work orders on a percentage allocation basis." The Company proposed to add, "Variable indirect costs include vehicle and equipment charges, materials handling charges and other costs that increase due to increased construction activity." The Company, in Section 19 D, changed "175 feet" to "250 feet" and changed "$1,000 per customer" to $2,000 per customer."

The change to Section 19 C was made to clarify the section. The proposed language is meant to update the tariff to reflect the actual costs associated with adding a new customers and to align the tariff with the parameters included in the Company's economic evaluation model. The prior language included costs that will be incurred regardless of adding a new customer. The changes to Section 19 D were made to increase the footage allowance up to Spire's internal 9.01% hurdle rate for 2" plastic. This analysis accounts for the increase in cost per foot since the rule was first enacted. The move to $2,000 is the investment level that remains economic for a low use customer, and still meets the Company's required hurdle rate. This analysis has not been updated in many years.

Q. PLEASE EXPLAIN THE PROPOSED MODIFICATIONS TO RULE 17.

A. The Company proposed changes to Sheet No. R-17 and its Curtailment Steps. The Company deleted "interruptible and basic transportation customers" in Step 1. The Company proposed to delete Step 2, "All sales service to both firm sales customers and firm transportation customers with alternate fuel capabilities to be curtailed to the extent of such alternate fuels. In the former Step 5, now Step 4, the Company added transportation customers. This language reflects the Company's proposed changes to rate classes in this rate case.

Q. PLEASE EXPLAIN THE PROPOSED CHANGES TO RULE 24.

A. In Rule 24, Budget Billing Plan, the Company deleted "commercial and industrial" and "General Services, Seasonal Services or General L.P. Services rate schedules" and added "general service and general L.P" to R-24 because the large commercial and industrial customer classes have been removed. Historically, those customers have had limited participation in the program.

Q. PLEASE EXPLAIN THE PROPOSED CHANGES TO RULE 33.

A. The Company proposed changes to Rule 33, Negotiated Gas Service Rider, which have potential benefits to multiple entities. The Company proposed adding the following sentence to Paragraph A, "Third, the tariff can also be used for grid resiliency, distributed generation, and emergency back-up systems." I discussed these themes in my direct testimony, at pages 25-27. The Company believes promoting grid resiliency, distributed generation, or emergency back-up systems is beneficial to the customer, Company, and the State of Missouri because it contributes to the reduction in emissions and improving energy resiliency. This additional tariff provision would allow for two scenarios. First, it would assist in developing rates to support grid resiliency, distributed generation, and emergency back-up systems. The second scenario would be the flip side to that and would offer negotiated rates if customers were going to leave Spire as a customer or substantially reduce their load with on site energy. The second scenario would fufill the purpose of the NGSR by allowing the Company to meet specific competitive threats, which if not responded to would result in lost margin to the Company and its customers. These benefits and costs need to be analyzed to see if a negotiated rate is justified.

Q. IS THE COMPANY PROPOSING A CARBON NEUTRAL INITIATIVE SPECIMEN TARIFF?

A. Yes, originally in my direct testimony Spire proposed a carbon neutral initiative program . After discussion with Staff, the Company and Staff concluded that a carbon neutral tariff would be helpful in visualizing and analyzing the proposed program. Please see schedule SAW-2 for the carbon neutral specimen tariff that is near identical to the carbon neutral program proposed in my direct testimony.

Q. DID THE COMPANY PROPOSE A COMBINED HEAT AND POWER PROGRAM AS PART OF ITS INITIAL FILING?

A. Yes. In my direct testimony, Spire proposed a combined heat and power program ("CHP"). This program was included in the initial filing because the Missouri Department of Energy proposed such a program late in the process of the Company's last rate case and the Commission demonstrated an interest in the parties continuing discussions on such a program.

Q. IS THE COMPANY FILING A TARIFF FOR ITS PROPOSED CHP PROGRAM?

A. No. After reviewing the list of Intervenors in this case and after discussions with Staff about the proposed CHP program, the Company has discussed and analyzed its proposal further. Ultimately, the Company believes this topic is more appropriate for a working docket where all industry participants are able to actively participate and discuss whether such a program can be successfully done in the state of Missouri.

Q. IS THERE ANY FINANCIAL IMPACT AS A RESULT OF THE COMPANY WITHDRAWING ITS PROPOSED CHP PROGRAM?

A. No.

Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc.'s Verified Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas.	))))))	 Case No. GR-2021-0108

<u>A F F I D A V I T</u>

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

Scott A. Weitzel, of lawful age, being first duly sworn, deposes and states:

1. My name is Scott A. Weitzel. I am the Managing Director, Regulatory and Legislative Affairs for Spire Missouri Inc. My business address is 700 Market St., St Louis, Missouri, 63101.

2. Attached hereto and made a part hereof for all purposes is my Supplemental Direct Testimony on behalf of Spire Missouri Inc. for the above referenced case.

3. Under penalty of perjury, I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

<u>*Scott A. Weitzel*</u>

Scott A. Weitzel

Dated this 12th day of March, 2021.

P.S.C. MO. No. Specimen Tariff SHEET No.

Spire Missouri Inc. d/b/a/ Spire For: Spire Missouri

VOLUNTARY CARBON NEUTRAL INITIATIVE OFFERING (CNI)

A. Purpose:
This Carbon Neutral Initiative (CNI) is a voluntary carbon offset program established to assist Spire's customers' efforts to participate in environmental sustainability and to meet the customers' desire to protect the environment. Because our customers have told us that the environment is important to them, Spire has decided to offer a voluntary carbon offset program for natural gas usage.

B. Description:
Primary Program:
Spire will partner with Forest ReLeaf of Missouri (ReLeaf), a non-profit organization in St. Louis, Missouri, to initiate this program because ReLeaf is a catalyst for restoring and sustaining our urban forests. ReLeaf operates the only nonprofit community-assisted tree nursery in the St. Louis region. The customer charges collected under this program will allow ReLeaf to plant trees in Missouri to offset a customer's approximate annual natural gas carbon footprint over the 30-year life of the trees. The proposed tree-based carbon sequestration will be verified by i-Tree, a state-of-the-art, peer-reviewed software suite from the United States Department of Agriculture Forest Service that provides urban and rural forestry analysis and benefits assessment tools. The i-Tree tools can help strengthen forest management and advocacy efforts by quantifying forest structure and the environmental benefits that trees provide.

Supplemental Programs:
The Company will only be allowed to charge customers a monthly rate identified in customer eligibility and charges identified below. If other carbon offset or technologies become economically viable or have the potential to help environmental efforts in Missouri, then the Company can use program funds to offset customers carbon footprint by investing in:

-Financial carbon offsets
-Investing in mechanical, filtration, chemical, facility bolt on, storage, or other technologies used to sequester or eliminate carbon output
-Direct air capture
-Land restoration
-Algae farms or microalgae
-Small scale renewable natural gas
-Other technologies not yet identified

C. Customer Eligibility and Charges:
This program is available to residential, commercial and industrial customers.
Residential customers:
Can elect to participate in CNI by checking a box on their bill, or by signing-up on the Spire MyAccount portal. The monthly customer charges for customers who elect to participate will be $4 per month starting on the effective date of this program. The monthly charge includes the price of the trees, planting, and 20% in administration and marketing costs. Customers will be locked into program prices that follow the Company's fiscal year.

Customer charges could increase to $6 per month in 2023, and $10 per month in 2024 or until the Company's next general rate case due to material, inflation, or other cost increases. Any program increases will require customers to voluntary re-enroll in the program.

Commercial and Industrial Customers:
Customized programs can be offered for commercial and industrial customers. Costs and program details will be filed with the Missouri Public Service Commission Staff ("Staff") and the Office of the Public Counsel ("OPC") 30 days prior to customer participation.

D. Reporting:
By December 31 of each year, the Company proposes to submit to Staff and OPC an annual report that includes: (i) the level of customer participation; (ii) the level of funds generated by the voluntary participants; (iii) type and amount of offset the investments made; and (iv) the amount of carbon offset resulting from program participation

DATE OF ISSUE: DATE EFFECTIVE:

ISSUED BY: Scott Weitzel, Managing Director, Regulatory & Legislative Affairs
Spire Missouri Inc., St. Louis, MO. 63101