BEFORE THE PUBLIC SERVICE COMMISSSION OF THE STATE OF MISSOURI

In the Matter of the Application of Spire Missouri, Inc., for)
Permission and Approval and a Certificate of Convenience)
and Necessity to Construct, Install, Own, Operate, Maintain,) File No. GA-2020-0105
and Otherwise Control and Manage a Natural Gas)
Distribution System to Provide Gas Service in Newton)
County as an Expansion of its Existing Certificated Areas)

<u>UNCONTESTED MOTION FOR EXPEDITED TREATMENT</u> AND NOTICE WITHDRAWING REQUEST FOR VARIANCE

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of itself and its operating unit, Spire Missouri West ("Spire West") and, pursuant to Rule 20 CSR 4240-2.080 (14) submits this Uncontested Motion for Expedited Treatment for approval of a Certificate of Convenience and Necessity to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage a Natural Gas Distribution System to Provide Gas Service in Newton County as an Expansion of its Existing Certificated Areas. The Company also submits its Notice Withdrawing its Request for Variance in response to the Commission Order issued on December 18, 2019. In support thereof, the Company states as follows:

- 1. On October 14, 2019, Spire Missouri filed an application on behalf of its operating unit for permission and approval of a Certificate of Convenience and Necessity ("CCN") to Construct, Install, Own, Operate, Maintain, and Otherwise Control and Manage a Natural Gas Distribution System to Provide Gas Service in Newton County as an Expansion of its Existing Certificated Areas.
- 2. On December 13, 2019, the Staff issued its Report and Recommendation in which it recommended that the Commission approve the Company's application for the requested CCN.
- 3. Spire Missouri appreciates the Staff's diligence in processing the Company's request for a CCN to serve the single poultry customer who will use natural gas to, among other

things, provide heat to its livestock. Because time is of the essence and the customer needs to have assurance in the very near future that such natural gas service will be available (or make alternative arrangements), the Company respectfully requests that the Commission approve the Company's requested CCN no later than at its next agenda meeting on December 30, 2019.

- 4. Spire Missouri submits that harm will be avoided by expedited approval of the requested CCN by permitting the requested gas service to be provided 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 requested CCN at the Commission's next agenda meeting.
- 5. This pleading was filed as soon as it could have been following the Staff's submission of its positive Report and Recommendation.
- 6. Finally, the Staff states in its Recommendation that it is unaware of any variance of Rule 20 CSR 4240-3.205(1)(A) required to process the Company's application. The Company agrees with Staff that given the information ultimately provided by the Company in support of the application that no variance is required and the Company hereby withdraws its request for such a variance.
- 7. The Company has consulted with counsel for the Commission Staff and the Office of the Public Counsel and both parties have indicated that they have no objection to this Motion for Expedited Treatment. Both parties, however, reserve the right to take whatever position they believe is appropriate in the Company's next rate case regarding the reasonableness and/or prudence of costs incurred in connection with providing service to the customer under the CCN. To facilitate that review, the Company agrees to provide updated information in its next rate case regarding the costs and revenues related to the extension.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that Commission consider and grant this Motion for Expedited Treatment and approve the CCN requested by the Company no later than at its next agenda meeting on December 30, 2019.

Respectfully submitted,

<u>/s/Goldie T. Bockstruck</u>

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ATTORNEYS FOR Spire Missouri Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Brief of Spire Missouri was served to all counsel of record on this 19th day of December, 2019 by hand-delivery, fax, electronic or regular mail.

/s/Michael C. Pendergast