

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

In the Matter of the Application of Spire Missouri)
Inc’s 2017/2018 Purchased Gas/Actual Cost Adjustment)
filing for its Spire Missouri East Operating Unit) **File No. GR-2019-___**

VERIFIED APPLICATION FOR WAIVER

COMES NOW Spire Missouri Inc. (referred to herein as “Spire Missouri” or “Company”), on behalf of its Spire Missouri East (“Spire East”) operating unit and, pursuant to Sections 4 CSR 240-2.060 and 240-3.015 of the Commission’s Rules, submits this application for waiver in connection with its 2017/2018 Purchased Gas/Actual Cost Adjustment filing. In support thereof, the Company states as follows:

1. Spire Missouri is a public utility incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri 63101. Contact information for communications with Spire Missouri, through the Company’s legal counsel, including Spire Missouri’s electronic mail address, fax number and telephone number, are set forth on the signature page of this Application.

2. A Certificate of Good Standing evidencing Spire Missouri’s standing to do business in Missouri is attached hereto as Exhibit 1 and incorporated herein by this reference. The information on such Certificate is currently applicable and correct.

3. Spire Missouri is primarily engaged in the business of distributing and transporting natural gas to customers in both the eastern and western portions of the State of Missouri, subject to the jurisdiction of the Commission. Spire Missouri serves customers in the City of St. Louis and ten counties in Eastern Missouri through its Spire East operating unit. Spire Missouri serves customers in the City of Kansas City and thirty counties in Western Missouri through its Spire West operating unit.

4. Other than cases that have been docketed at the Commission, Spire Missouri 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.

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

6. On October 31, 2018, Spire Missouri Inc. filed tariff sheets with an effective date of November 15, 2018 pursuant to the provisions of Sheet Nos. 11-11.16 of its Purchased Gas Adjustment (“PGA”) tariff. The purpose of the tariff filing was to reflect changes to the Company’s Current Purchased Gas Adjustment (“CPGA”) and its Actual Cost Adjustment (“ACA”) factors for natural gas customers.

7. Sheet No. 11.16 of the tariff filing sets forth a 5 cents per therm total ACA rate for the Company’s Vehicle Fuel (“VF”) service. The 5 cents per therm rate is consistent with a rate cap for VF service that was previously reflected in the Company’s PGA tariff. That explicit rate cap was eliminated a number of years ago, however, and in light of gas cost increases that have accumulated for VF service, the Company believes that a higher rate should be applied to this service in the Company’s PGA filing. In the interests of avoiding rate shock, however, the Company seeks to increase the ACA rate for VF service to 10 cents per therm, instead of the full 26 cents per therm that could be supported by those higher deferred balances. It should be noted that a 10 cent rate will still permit the gas cost balances that have accumulated for the VF service class to be worked down over a reasonable period of time. For reference, the current PGA for VF is \$0.43348 with an ACA rate of \$0.05 for a total PGA of \$0.48348. There are 7 VF customers. The Staff has indicated that it does not oppose such a result.

8. Pending the Commission's determination of this request for any variance from the calculation provisions of its PGA/ACA tariff that may be necessary to implement the revised rate, the Company has contemporaneously filed a substitute tariff sheet that includes the 10 cent rate for VF service.

WHEREFORE, for the foregoing reasons, Spire Missouri Inc. respectfully requests that the Commission grant its application for waiver for the reasons and purposes specified herein.

Respectfully submitted,

SPIRE MISSOURI INC.

/s/ Michael C. Pendergast

Of Counsel

Fischer & Dority, P.C.

Telephone: (314) 288-8723

423 (R) South Main Street

St. Charles, MO 63301

(314) 288-8723

Email: mcp2015law@icloud.com

/s/ Rick Zucker

Rick Zucker, #49211

Zucker Law LLC

Telephone: (314) 575-5557

14412 White Pine Ridge

Chesterfield, MO 63017

(314) 575-5557

E-mail: zuckerlaw21@gmail.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on Staff and the Office of the Public Counsel, on this 5th day of November 2018 by hand-delivery, fax, electronic mail or by regular mail, postage prepaid.

/s/ Michael C. Pendergast

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

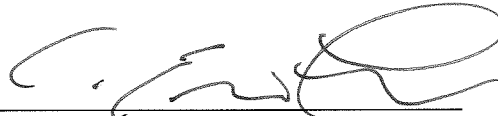
In the Matter of the Application of Spire Missouri)	
Inc's 2017/2018 Purchased Gas/Actual Cost Adjustment)	File No. GR-2019-___
filing for its Spire Missouri East Operating Unit)	

VERIFICATION

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

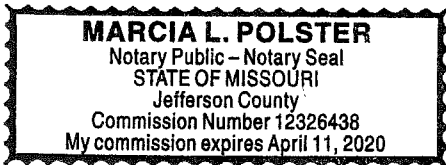
C. Eric Lobser, of lawful age, being first duly sworn, on his oath states that he is Vice President – Regulatory and Governments Affairs for Spire Missouri, Inc., the applicant in the foregoing Application; that he has read said Application and that the matters and things set forth therein are true and correct to the best of his knowledge, information and belief.


:



C. Eric Lobser

Subscribed and sworn to before me this 5th day of November, 2018.





Notary Public, State of Missouri

EXHIBIT 1

CERTIFICATE OF GOOD STANDING

OF

SPIRE MISSOURI INC.

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

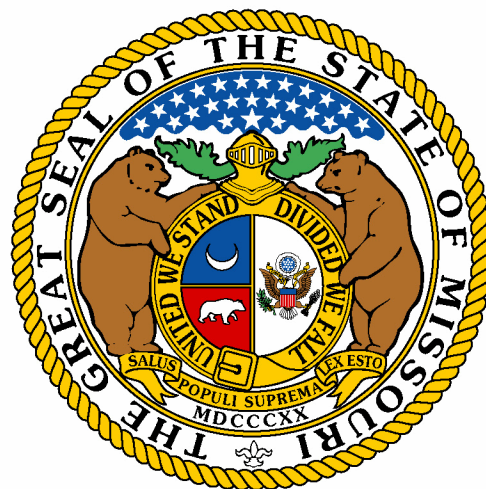
I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

Spire Missouri Inc.
00042501

was created under the laws of this State on the 2nd day of March, 1857, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 5th day of November, 2018.


Secretary of State



Certification Number: CERT-11052018-0040

Specimen Tariff

P.S.C. MO. No. 7
CANCELLING P.S.C. MO. No.7

First Revised
Original

SHEET No. 11.16
SHEET No. 11.16

Spire Missouri Inc. d/b/a/ Spire

For: Spire Missouri East

PURCHASED GAS COST ADJUSTMENT
PGA

Adjustment Statement

In accordance with the Company's Purchased Gas Adjustment Clause contained in Sheet Nos. 11 through 11.16, inclusive and the Company's Purchased L.P. Gas Adjustment Clause contained on Sheet No. 8 and Sheet No. 8.1, the following adjustments per therm or per gallon, where applicable, will become effective on and after the effective date of this tariff.

<u>Sales Classification</u>	<u>Current PGA</u>	<u>ACA-Including Refunds</u>	<u>FAF</u>	<u>Total Adjustment</u>
Residential General	46.150¢	(0.478)¢	(0.000)¢	45.672¢
Small General Service	46.150¢	(0.478)¢	(0.000)¢	45.672¢
Large General Service	46.150¢	(0.478)¢	(0.000)¢	45.672¢
Large Volume Service	46.150¢	(0.478)¢	(0.000)¢	45.672¢
Interruptible	30.260¢	(0.611)¢	(0.000)¢	29.649¢
LVTSS*		(13.501)¢		
VF*		10.000¢	0.000¢	
Other Firm Service:	46.150¢	(0.478)¢	(0.000)¢	45.672¢
L.P. Gas	185.000¢	(26.162)¢		158.838¢

Residential sales are rendered under Residential General Service (Sheet No. 2)
SGS & LGS sales are rendered under Small General Service and Large General Service (Sheet Nos. 3, and 4), respectively.
LVTSS sales are rendered under the Large Volume Transportation and Sales Service Rate (Sheet No. 10).
VF sales are rendered under the Vehicular Fuel Rate (Sheet No. 9).
Other Firm sales are rendered under the Large Volume Service Rate (Sheet No. 5) and the Unmetered Gas Light Service Rate (Sheet No. 6).
Interruptible sales are rendered under the Interruptible Service Rate (Sheet No. 7).
L.P. Gas sales are rendered under the General L.P. Gas Service Rate (Sheet No. 8).

* Revised each month in accordance with Section A.5 of the PGA clause.

Additional Transportation Charges, ACA Factors and Refunds

<u>Customer Groups</u>	<u>TOP</u>	<u>Capacity Reservation</u>	<u>Other Non-Commodity</u>	<u>ACA</u>
Firm		12.240¢	-	4.968¢
Basic				0.000¢

DATE OF ISSUE: October 31, 2018

DATE EFFECTIVE: November 15, 2018

ISSUED BY: C. Eric Lobser, VP, Regulatory & Governmental Affairs
Spire Missouri Inc., St. Louis, MO. 63101