

**Exhibit No:** \_\_\_\_\_  
**Issue:** **STP Tariff Revisions  
Balancing and Cash  
Outs**  
**Witness:** **Lew Keathley**  
**Type of Exhibit:** **Surrebuttal Testimony**  
**Sponsoring Party:** **Spire Missouri Inc.**  
**Case Nos.:** **GR-2021-0108**  
**Date Testimony Prepared:** **July 14, 2021**

**SPIRE MISSOURI INC.**  
**CASE NO. GR-2021-0108**  
**SURREBUTTAL TESTIMONY**  
**OF**  
**LEW KEATHLEY**  
**JULY 14, 2021**

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**SCHEDULE:**

**Schedule LEK-SR-1: Revised Tariff Language**

1 **SURREBUTTAL TESTIMONY OF LEW KEATHLEY**

2 **I. INTRODUCTION**

3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A. My name is Lew Keathley, and my business address is 700 Market Street, St. Louis, Missouri  
5 63101.

6 **Q. ARE YOU THE LEW KEATHLEY THAT PREVIOUSLY FILED REBUTTAL**  
7 **TESTIMONY IN THIS CASE?**

8 A. Yes, I am.

9 **II. PURPOSE OF TESTIMONY**

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A. The purpose of my testimony is to respond to several arguments and statements made in the  
12 Rebuttal Testimony made by the Missouri Public Service Commission Staff (“Staff”) Witness  
13 Kennan Patterson, which was filed on June 17, 2021 and supplement my response to Missouri  
14 School Board Association (“MSBA”) Witness Louie Ervin. Specifically, I will provide  
15 Surrebuttal Testimony on the proposed tariff language revisions relating to the School  
16 Transportation Program (“STP”) and the transportation and STP cash-out balancing systems.

17 **III. STP TARIFF REVISIONS**

18 **Q. HAS SPIRE COMPLETED ITS REVIEW AND ASSESSMENT OF MSBA’S**  
19 **PROPOSAL TO REVISE THE SCHOOL TRANSPORTATION PROGRAM**  
20 **TARIFF?**

21 A. Yes.

22 **Q. WHAT ARE MSBA’S PROPOSED REVISIONS TO THE STP TARIFF?**

1 A. MSBA proposes that the capacity release formula be changed to base the capacity release  
2 determination on the maximum daily requirement during a rolling historic seven-year  
3 period, with an additional 110% multiplier for safety margin. MSBA also proposes  
4 allowing schools to select capacity on either, or a combination of, the MRT or Spire STL  
5 pipelines for service to Spire’s Eastern service area and Southern Star for the Spire West  
6 Service area.

7 **Q. DO YOU AGREE WITH THESE REVISIONS?**

8 A. I am comfortable based on historical data that the revision to the capacity release  
9 determination will cover the schools’ needs. While the Company does agree in principle  
10 with the MSBA’s proposal, I do have some modifications to MSBA’s proposed tariff  
11 language that will add more clarity regarding the process of MSBA’s selection of capacity.  
12 I also added language to ensure that final determination of capacity release will ultimately  
13 be based on the operational availability of Spire. A copy of these modifications can be  
14 found in Schedule LEK-SR1.

15 **IV. BALANCING AND CASH OUTS**

16 **Q. WHAT IS STAFF’S RECOMMENDATION REGARDING SPIRE’S PROPOSED**  
17 **TRANSPORTATION BALANCING AND CASH OUT PROVISIONS?**

18 A. Staff recommends the Commission approve the cash-out balancing provisions for  
19 transportation customers in Spire’s proposed Transportation Service tariff.

20 **Q. DO YOU AGREE WITH THIS RECOMMENDATION?**

21 A. Yes.

1 **Q. WHAT IS STAFF'S RECOMMENDATION REGARDING SPIRE'S PROPOSED**  
2 **BALANCING AND CASH OUT PROVISIONS RELATED TO SCHOOL**  
3 **AGGREGATION POOLS?**

4 A. Staff recommends that the Commission approve the balancing provisions of Spire's  
5 proposed STP tariff.

6 **Q. DO YOU AGREE WITH STAFF'S RECOMMENDATION?**

7 A. Yes.

8 **V. CONCLUSION**

9 **Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

10 A. Yes, it does.



**E. Transportation Capacity:**

Participating ESEs may request annually in writing, and the Company will release to the participating ESEs or their agent, primary firm transportation capacity on Enable Mississippi River Transmission Corporation, Spire STL, or Southern Star Central interstate pipelines at the Company's cost of such capacity in accordance with the capacity release procedures contained in the respective Federal Energy Regulatory Commission approved pipeline tariff. Such capacity shall be released to and taken by the party designated by the Association on a recallable basis, but will not be recalled by the Company unless requested by the Association and agreed to by the Company, or unless the Association fails to deliver gas supplies in accordance with the Adjusted Delivery Schedule, as further adjusted for any imbalance, as set forth in Section G. The amount of capacity released during the respective November through March winter month season and April through October summer month season shall equal 110% of the maximum daily use based on the most recent seven years of usage for each respective season, as adjusted for Association account additions and drops. If such maximum daily use history is not available, Company shall estimate such maximum daily use based on other available data, including sample daily school use, school calendars, school cancellations, weather algorithms, maximum daily nominations and factors described in Sheet No. R-25 of the Company's tariff for such ESE and the peak monthly degree days that occurred during the most recent seven years.

**E. Transportation Capacity (REDLINE over MSBA edits):**

~~Participating ESEs may request annually in writing, and t~~The Company will release to the participating ESEs or their agent, primary firm transportation capacity on Enable Mississippi River Transmission Corporation ~~and/or;~~ Spire STL ~~(for Spire East), or and~~ Southern Star Central ~~(for Spire West)~~ interstate pipelines at the Company's cost of such capacity in accordance with the capacity release procedures contained in the respective Federal Energy Regulatory Commission approved pipeline tariff. Participating ESEs may also specify which of the aforementioned pipelines it would like to take capacity from by making request to the Company. Such requests must be made annually in writing, by September 1 of each year. Final determination on capacity release will be based on operational availability by the Company.

Such capacity shall be released to and taken by the party designated by the Association on a recallable basis, but will not be recalled by the Company unless requested by the Association and agreed to by the Company, or unless the Association fails to deliver gas supplies in accordance with the Adjusted Delivery Schedule, as further adjusted for any imbalance, as set forth in Section G. The amount of capacity released during the respective November through March winter month season and April through October summer month season shall equal 110% of the maximum daily use based on the most recent seven years of usage for each respective season, as adjusted for Association account additions and drops. If such maximum daily use history is not available, Company shall estimate such maximum daily use based on other available data, including sample daily school use, school calendars, school cancellations, weather algorithms, maximum daily nominations and factors described in Sheet No. R-25 of the Company's tariff for such ESE and the peak monthly degree days that occurred during the most recent seven years.