

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

In the Matter of Spire Missouri Inc.’s Proposed) **Case No. GT-2020-0186**
Gas Supply Incentive Plan Tariff Sheet Filing) Tariff Filing No. JG-2020-0104

**RESPONSE OF SPIRE MISSOURI INC. TO
MOTION TO OPEN DOCKET AND
SUSPEND TARIFF SHEET FOR ADDITIONAL 120 DAYS**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), on behalf of itself and its operating unit, Spire Missouri East (“Spire East”), and for its Response to the Motion To Open Docket and Suspend Tariff Sheet for an Additional 120 days filed by the Staff of the Missouri Public Service Commission (“Staff”) on December 31, 2019 (the “Motion”), states as follows:

1. On December 18, 2019, Spire Missouri filed a revised tariff sheet, P.S.C. MO. No. 7 First Revised Sheet No. 11.10 (JG-2020-0104) (the “Tariff”) to revise and update the benchmark that is used to measure savings under Spire East’s Gas Supply Incentive Plan (“GSIP”) to reflect the impact of changes to its gas supply portfolio resulting from its recently effective transportation arrangement with Spire STL Pipeline. Tariff sheet 11.10 bears an effective date of January 17, 2020. As the Staff notes in its Motion, the GSIP is an incentive mechanism that provides Spire East an opportunity to retain some of the savings achieved through its gas commodity purchasing decisions.

2. In its Motion, the Staff requests that a docket be opened and the Tariff suspended for an additional 120 days beyond its current effective date of January 17, 2020 so that Staff can conduct a more extensive evaluation of what it characterizes as the “numerous operational, economic, and reliability questions” resulting from this change in the Company’s gas supply portfolio. (Staff Motion, p. 2).

3. The Company filed this revision to its GSIP Tariff because Section 1(b) of the Tariff itself specifically provides that the “Company shall notify Staff and OPC promptly upon any individual changes to its pipeline capacity equal to or greater than 10% of existing subscribed capacity, and shall work with OPC and Staff to set a new GSIP benchmark.” Because this threshold condition was met with the introduction of the new transportation arrangement with Spire STL Pipeline, the Company believed that its Tariff filing would be an appropriate way to open a discussion with Staff and OPC regarding the setting of a new GSIP benchmark. However, because the incentive features of the GSIP are not even operational today (due to the low commodity cost of gas currently being procured by Spire Missouri), the Company does not believe there is any immediate need to expend significant regulatory resources on revising the GSIP benchmark. In the absence of such a need, the Company further believes that it would be more productive to address this matter on a more informal basis with the Staff and OPC to determine if a consensus on this issue can be reached before proceeding further with a tariff change.

4. In light of these considerations, the Company is on this date withdrawing its revised tariff sheet, P.S.C. MO. No. 7 First Revised Sheet No. 11.10, without prejudice to its right to refile a tariff once it has had an opportunity to further explore potential changes to the benchmark with Staff and OPC. As a result, the Company submits that no further action by the Commission is required at this time.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that Commission consider this Response to Staff’s Motion to Open Docket and Suspend Tariff Sheet for Additional 120 days.

Respectfully submitted,

/s/Matthew Aplington

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served to all counsel of record on this 6th day of January, 2020 by hand-delivery, fax, electronic or regular mail.

/s/Rick Zucker _____