



Spire Inc.  
700 Market  
St. Louis, MO 63101

January 15, 2019

VIA EFIS

Secretary  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
Jefferson City, MO 65101

Dear Secretary,

Enclosed herewith for filing with the Missouri Public Service Commission is the revised tariff sheets, P.S.C. MO. No. 7 First Revised Sheet No. R-30.16 and P.S.C MO. No. 8 First Revised Sheet No. R-30.16 in regards to the Western Missouri operating division of Spire Missouri Inc. d/b/a Spire (the "Company"). These revised tariff sheets, have an issue date of January 15, 2019, and an effective date of February 14, 2019, reflected by Sheet Nos. 7 & 8 R-30.16 of the Company's tariff.

Spire will file workpapers with Staff and OPC that include a Spire natural gas impact evaluation for the pilot program which utilized a simple weather-normalized billing analysis to compare the small group of twelve treated homes to a somewhat larger group of similar, untreated homes. Given the small size of this pilot, this was the most appropriate methodology and provided a reasonable estimate of the average savings across the entire participant group and for all measures. With the continuation of this program being implemented at a larger scale, the larger population would permit the use of regression and other statistical methods where they are appropriate. This could also allow better estimates of savings by measure type, building type, demographics, and other variables that would support program planning and design.

The City of Independence has approved Independence Power and Light (IPL) to continue and increase this co-delivery pilot program from \$46,000 to \$100,000.00 annually which Spire intends to match. This program will continue to be implemented by Truman Heritage Habitat for Humanity. Once the tariff is approved Spire will finalize the contract with Truman Heritage Habitat for Humanity to start the program right away with IPL to serve customers.

Sincerely,  
/s/ Shaylyn Dean  
Shaylyn Dean