

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

In the Matter of the Establishment of a Working)
Case for the Review and Consideration of a Rewrite) **File No. AW-2018-0385**
of the Existing Electric and Gas Promotional)
Practices Rule Into One Rule)

SPIRE MISSOURI’S ADDITIONAL COMMENTS

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), and in response to the Missouri Public Service Commission’s (“Commission”) January 30, 2020 *Request for Additional Comments and Notice of Workshop*, submits these Additional Comments, stating as follows:

1. Spire thanks the Staff for facilitating the workshop on January 20, 2020 in order to streamline the promotional practice rules for Missouri’s investor owned gas and electric utilities. While most of the stakeholders agree that streamlining the rules is beneficial, those same stakeholders also present additional goals for the promotional practice rules that have great implications for the utilities.

2. At the workshop, Evergy advocated for beneficial electrification. The Office of the Public Counsel advocated for free market competition and a change to how costs pertaining to promotional practice should be recovered. Given the great impact these ideas (if promulgated into a rule) could have on the utilities, Spire Missouri requests another workshop be held as recommended by Staff.

3. Spire Missouri believes an additional workshop will allow interested stakeholders to further analyze and discuss the implications of some of these ideas, and ultimately achieve more balanced and fair promotional practice rules.

Respectfully submitted,

SPIRE MISSOURI INC.

/s/Goldie T. Bockstruck

Goldie T. Bockstruck #58759

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Comments has been duly served upon all Parties of record, by hand delivery, email, fax, or United States mail, postage prepaid, on this 20th day of March, 2020.

/s/Goldie T. Bockstruck _____