

<b>Exhibit No:</b>	_____
<b>Issue:</b>	<b>Customer Comments and True-Up Testimony</b>
<b>Witness:</b>	<b>Michelle Antrainer</b>
<b>Type of Exhibit:</b>	<b>True Up Rebuttal Testimony</b>
<b>Sponsoring Party:</b>	<b>Spire Missouri Inc.</b>
<b>Case No.:</b>	<b>GR-2021-0108</b>
<b>Date Testimony Prepared:</b>	<b>August 16, 2021</b>

**SPIRE MISSOURI INC.**

**CASE NO. GR-2021-0108**

**TRUE-UP REBUTTAL TESTIMONY**

**OF**

**MICHELLE ANTRAINER**

**AUGUST 16, 2021**

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1                   **TRUE-UP REBUTTAL TESTIMONY OF MICHELLE ANTRAINER**

2                                   **I. INTROUCTION**

3   **Q.    WOULD YOU PLEASE STATE YOUR NAME AND BUSINESS ADDRESS?**

4   A.    My name is Michelle Antrainer. My business address is 700 Market Street, St. Louis,  
5           MO 63101.

6   **Q.    HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS CASE?**

7   A.    Yes. I submitted Direct, Rebuttal, Surrebuttal and True-Up Direct Testimony on behalf  
8           of Spire Missouri Inc. (“Spire” or “Company”) in this rate case.

9                                   **II. PURPOSE OF TESTIMONY**

10 **Q.    WHAT IS THE PURPOSE OF YOUR TRUE-UP REBUTTAL TESTIMONY?**

11 A.    The purpose of my testimony is to respond to the True-Up Direct Testimony filed by  
12           witness Robert E. Schallenberg on behalf of the Office of Public Counsel (“OPC”) and the  
13           True-Up Direct Testimony of Karen Lyons on behalf of Missouri Public Service  
14           Commission Staff (“Staff”).

15                                   **III. CUSTOMER COMMENTS**

16 **Q.    OPC WITNESS ROBERT SCHALLENBERG PROVIDED TWO SCHEDULES**  
17 **WITH HIS TRUE-UP DIRECT TESTIMONY THAT INCLUDED UPDATED**  
18 **PUBLIC COMMENTS LISTED FOR THIS RATE CASE AND ADDITIONAL**  
19 **PUBLIC MATERIAL THAT WAS ADDED SINCE HIS REBUTTAL**  
20 **TESTIMONY WAS FILED, TO ASSERT THAT THE COMMISSION SHOULD**  
21 **NOT APPROVE ANY INCREASE TO SPIRE MISSOURI’S RATES IN THIS**  
22 **CASE. DO YOU AGREE?**

1 A. No. Spire does not agree with Mr. Schallenberg’s recommendation that an increase  
2 should not be approved. Mr. Schallenberg relies on public comments as a basis for this  
3 assertion. While reviewing the public comments that were submitted in this case, I  
4 noticed several comments were made regarding the Company’s discrimination lawsuit  
5 and executive incentive pay. Expenses related to both of these items are excluded from  
6 the Company’s revenue requirement calculation as noted in Scott Weitzel’s Rebuttal  
7 Testimony and the Partial Stipulation and Agreement filed on July 30, 2021 (“July 30  
8 Agreement”), and are therefore not included in any rate increase to the Company.

9 **Q. HAS LIMITED INCOME PROGRAMMING BEEN ADDRESSED AS PART OF**  
10 **THIS RATE CASE?**

11 A. Yes. Spire, the Office of the Public Counsel, Staff of the Missouri Public Service  
12 Commission, Consumers Council of Missouri, Renew Missouri, National Housing  
13 Trust and Legal Services of Eastern Missouri have agreed to resolution of the Limited  
14 Income Programs as part of the Nonunanimous Stipulation and Agreement filed with  
15 the Commission on August 5, 2021 (“August 5 Agreement”). This agreement, among  
16 other things, expands program eligibility from 185% of the Federal Poverty Level  
17 (“FPL”) to 200% FPL and maintains the current residential customer charge for Spire’s  
18 customers. The Company recommends approval of the August 5 Agreement.

19 **Q. DOES SPIRE HAVE OTHER METHODS TO ASSIST THOSE CUSTOMERS?**

20 A. Yes. Spire has several programs that assist with bill pay for customers on limited or  
21 fixed incomes. Spire assists customers using the Limited-Income Program funds,  
22 DollarHelp funds, and the Cold Weather Payment Arrangement. There are other  
23 proactive measures that Spire completes for our Limited-Income customers, including

1           outbound calls to reconnect services using DollarHelp funds, reaching out to agencies  
2           to pledge crisis funds on accounts that are in threat of disconnection, and offering  
3           assistance with filling out LIHEAP applications. These programs are detailed in the  
4           Rebuttal and Surrebuttal Testimony of Julie Trachsel.

5   **Q.   PLEASE EXPLAIN THE COMPANY’S RESPONSE TO THE RECOVERY OF**  
6   **INFRASTRUCTURE SYSTEM REPLACEMENT SURCHARGE (“ISRS”)**  
7   **COSTS REFERENCED IN SOME OF THOSE COMMENTS.**

8   A.   The ISRS is designed to recover the costs associated with the Company’s eligible  
9   infrastructure replacements in accordance with the provisions of Sections 393.1009 to  
10   393.1015 RSMo (2020). This provision sets the rules for utilities who implement an  
11   ISRS program. “6. (1) A gas corporation that has implemented an ISRS pursuant to  
12   the provisions of sections 393.1009 to 393.1015, RSMo (2020) shall file revised rate  
13   schedules to reset the ISRS to zero when new base rates and charges become effective  
14   for the gas corporation following a commission order establishing customer rates in a  
15   general rate proceeding that incorporates in the utility's base rates subject to subsections  
16   8 and 9 of this section eligible costs previously reflected in an ISRS.” Spire is  
17   complying with the existing regulations by adding ISRS capital to the overall rate base  
18   as part of the general rate case.

19   **IV. STAFF’S TRUE-UP TESTIMONY**

20   **Q.   WHAT IS SPIRE’S UNDERSTANDING OF STAFF’S TRUE-UP REVENUE**  
21   **REQUIREMENT?**

22   A.   Staff’s true-up direct filing included a combined Missouri mid-range revenue  
23   requirement of \$85,772,232. The July 30 Agreement included an additional \$587,904

1 revenue requirement. Another Partial Stipulation Agreement filed on August 12, 2021  
2 (“August 12 Agreement”) relates to Pension, OPEB and Property Tax Tracker  
3 amortizations that would increase the combined revenue requirement by \$2,666,316.  
4 Assuming Commission approval of the July 30, and August 12 Agreements, Spire  
5 concludes that Staff’s adjusted combined mid-range revenue requirement equals  
6 \$89,026,452. Spire recommends approval of the July 30 Agreement and the August 12  
7 Agreement.

8 **Q. WHAT IS SPIRE’S RESPONSE TO CONCERNS THAT STAFF WITNESS**  
9 **KAREN LYONS RAISED IN HER TRUE-UP TESTIMONY RELATED TO THE**  
10 **LEVEL OF PLANT ADDITIONS AT MAY 31, 2021 (LYONS TRUE-UP**  
11 **DIRECT, PG. 4.)?**

12 A. Staff expressed some concerns that Spire’s decision to close out work projects by the  
13 true-up deadline of May 31, 2021 may have had adverse impacts to customers where  
14 projects were suspended so that construction crews may move on to projects that could  
15 be completed by the true-up deadline and that additional costs may have been incurred  
16 as a result. Staff indicated they would address this issue further after requesting  
17 additional information from the Company. Spire responded to Staff data requests  
18 (“DR”) 0493 and 0494 which relate to the level of plant additions in this time period.  
19 Throughout fiscal year 2021, a strategic and coordinated effort was undertaken to ensure  
20 the timely closure of all capital projects, regardless of type of project. Crews from  
21 completed jobs are often assigned to assist other crews working on open projects, rather  
22 than start on new projects, which limits the amount of open work in progress  
23 expenditures compared to historical levels. Spire did not incur any measurable increase

1 in costs through additional overtime or for other reasons as part of the focus of getting  
2 projects completed. The operational practices undertaken during this time period were  
3 consistent with the Company's past behavior, specifically leading to similar filings such  
4 as ISRS. Spire's operational decisions did not adversely impact its customers nor did  
5 they impact any customer's access to gas service.

6 **V. SPIRE UPDATES TO TRUE-UP DIRECT TESTIMONY**

7 **Q. PLEASE DESCRIBE ANY UPDATES RELATED TO YOUR TRUE-UP**  
8 **DIRECT TESTIMONY.**

9 A. My True-Up Direct Testimony was based on the Company's current filed position.  
10 Several of those items were included in the July 30 Agreement which has not yet been  
11 approved by the Commission. Some of those resolved issues were addressed in the  
12 True-Up Direct Testimony. As stated above, the Company recommends that the  
13 Commission approve the July 30 Agreement because it includes items that were  
14 amicably resolved among the Signatories to the Agreement and was not opposed by  
15 non-Signatory parties.

16 **VI. CONCLUSION**

17 **Q. DOES THIS CONCLUDE YOUR TRUE-UP REBUTTAL TESTIMONY?**

18 A. Yes.

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

In the Matter of Spire Missouri Inc.'s d/b/a )  
Spire Request for Authority to Implement a General ) **Case No. GR-2021-0108**  
Rate Increase for Natural Gas Service Provided in )  
the Company's Missouri Service Areas )

A F F I D A V I T

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

Michelle Antrainer, of lawful age, being first duly sworn, deposes and states:

1. My name is Michelle Antrainer. I am Lead Regulatory Analyst at Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri, 63101.
2. Attached hereto and made a part hereof for all purposes is my testimony on behalf of Spire Missouri Inc.
3. Under penalty of perjury, I declare that my answers to the questions contained in the foregoing testimony are true and correct to the best of my knowledge and belief.

/s/ Michelle Antrainer  
Michelle Antrainer

August 16, 2021  
Date