

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

In the Matter of the Application of Spire Missouri )  
Inc. for a Temporary Variance of its Meter )  
Sampling Program for Diaphragm Meters During ) Case No. GE-2023-0354  
Deployment of Ultrasonic Automated Metering )  
Infrastructure. )

**MOTION FOR EXPEDITED TREATMENT**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or "Company"), by and through its counsel, and, pursuant to Rule 20 CSR 4240-2.080 (14), submits this Motion for Expedited Treatment to permit the First Revised Tariff Sheet No. R-8 filed by the Company on this date to become effective on September 29, 2023, stating the following:

1. On April 11, 2023, Spire Missouri filed an application for a temporary variance of its meter sampling programs.
2. On April 11, 2023, the Missouri Public Service Commission (“Commission”) directed the Staff of the Commission (“Staff”) to file a recommendation or status report no later than May 11, 2023.
3. On July 10, 2023, Staff filed its recommendation, which recommended the Commission grant Spire Missouri’s request for a variance for its Spire Missouri East operating area, with proposed conditions, and deny its variance for its Spire Missouri West operating area.
4. On August 21, 2023, Spire Missouri and Staff filed a Full and Unanimous Stipulation and Agreement (“Stipulation”) in which the parties agreed that the variance for the Spire Missouri West operating area should be denied, and the variance for the Spire Missouri East operating area should be approved, subject to the agreed upon conditions.

5. The parties also agree that Spire Missouri would file an updated Sheet No. R-8 reflecting the Commission's order in this case.

6. On September 7, 2023, the Commission issued its order approving the Stipulation and directing Spire Missouri to file an updated tariff sheet reflecting the variance approved by the order. In compliance with both the Stipulation and the Commission's order, the Company has contemporaneously filed, with this Motion for Expedited Treatment, its First Revised Sheet No. R-8.

7. The purpose of this Motion for Expedited Treatment is to enable the First Revised Tariff Sheet No. R-8 to become effective on September 29, 2023.

8. Spire Missouri submits that harm will be avoided by expedited approval of the tariff sheet as any continued testing under the Company's meter testing program only represents a wasted cost for both Spire Missouri and its customers. Any meter covered by this variance will be replaced well within the time required for replacements of meter groups that fail testing under the existing sampling program.

9. Further, Spire Missouri submits that expedited approval benefits both Spire Missouri and its customers as the Company will be able to start conserving the time and resources historically used for the sampling program, quickly shifting valuable resources to the meter replacement strategy.

10. There will also be no negative impact on the Company's customers or the general public. As discussed above, under this variance, Spire Missouri will still be replacing meters within the time requirements for meter groups that fail testing under the existing sampling program. Additionally, customers may still request a meter test at any time, and the Company will inform customers of the option to test their old meter at the time of replacement if an appointment to perform the replacement is required.

11. This Motion was filed as soon as it could have been following the Company's preparation and filing of the revised tariff sheet reflecting the Commission's order.

**WHEREFORE**, Spire Missouri requests that the Commission grant its Motion for Expedited Treatment to allow the First Revised Tariff Sheet R-8 to go into effect on September 29, 2023, and any other relief as is just and reasonable.

**Respectfully submitted,**

*/s/ J. Antonio Arias*

Matthew Aplington MoBar #58565  
General Counsel  
Spire Missouri Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
(314) 342-0785 (Office)  
Email: matt.aplington@spireenergy.com

J. Antonio Arias MoBar #74475  
Counsel, Regulatory  
Spire Missouri, Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
(314) 342-0655 (Office)  
Email: antonio.arias@spireenergy.com

**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was serve on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 15th day of September, 2023.

/s/Lew Keathley