BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Spire Missouri Inc. d/b/a Spire to Change its Infrastructure System Replacement Surcharge in its Spire Missouri East and West Service Territories

Case No. GO-2023-0432

<u>SPIRE MISSOURI INC'S</u> MOTION FOR EXPEDITED TREATMENT

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of itself and its two operating units, Spire Missouri East ("Spire East") and Spire Missouri West ("Spire West") and, pursuant to Rule 20 CSR 4240-2.080 (14) submits this Motion for Expedited Treatment to the Missouri Public Service Commission ("Commission") to permit the Revised Tariff Sheet filed by the Company on this date to become effective on October 16, 2023. In support thereof, the Company states as follows:

1. On September 18, 2023, Staff of the Missouri Public Service Commission ("Staff") issued its *Staff Recommendation*. Staff recommends that the Infrastructure System Replacement Surcharge ("ISRS") revenue requirements be increased by \$3,448,192 and \$8,944,014 for Spire East and Spire West, respectively.

2. On September 26, 2023, Spire Missouri filed its *Response to Staff Recommendation* accepting Staff's recommended revenue requirements. No other party in this docket has filed a response to the *Staff Recommendation* or to Spire Missouri's *Response to Staff Recommendation*.

3. On October 4, 2023, the Commission issued its *Order Approving Infrastructure System Replacement Surcharge*, in which it rejected the tariff sheet originally filed by Spire Missouri on June 20, 2023, and it authorized the Company to file a tariff revision sufficient to recover ISRS revenues consistent with Staff's recommendations. Consistent with the statutory deadline set forth in the ISRS Statute (*see* Sections 393.1009 RSMo. to 393.1015 RSMo.) for processing ISRS applications, the Commission made its Order effective on October 14, 2023.

4. In compliance with the Commission's Order, the Company has contemporaneously filed, with this Motion for Expedited Treatment, a revised tariff sheet to recover the ISRS revenues authorized by the Commission.

5. The purpose of this Motion for Expedited Treatment is to enable the Company's revised tariff sheet filed on this date to become effective on October 16, 2023, if practical.

6. Spire Missouri submits that harm will be avoided by expedited approval of the revised tariff sheet since it will permit the new ISRS revenues authorized by the Commission in this case to become effective within the 180-day time period mandated by the ISRS Statute. At the same time, there will be no negative impact on the Company's customers or the general public if the Commission grants such relief. Further, as the Company has accepted Staff's recommended ISRS revenue requirements that were filed in this docket over three weeks ago, there will be no additional burden on Staff, or any other party, to review the revised tariff sheet before the desired effective date. For all of these reasons, Spire Missouri submits that there is good cause for the Commission to approve the proposed tariff to become effective on October 16, 2023.

7. This pleading was filed as soon as it could have been following the Company's preparation and filing of the revised tariff sheet implementing the terms of the Order issued by the Commission in this case on October 4, 2023.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that the Commission consider and grant this Motion for Expedited Treatment and approve the revised tariff sheet to become effective on October 16, 2023.

2

Respectfully submitted,

/s/ J. Antonio Arias

Matthew Aplington MoBar #58565 General Counsel Spire Missouri Inc. 700 Market Street, 6th 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, 6th 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 4th day of October, 2023.

/s/ Julie Johnson