

**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) **File No. GO-2023-0432**
System Replacement Surcharge in its Spire) **Tariff No. JG-2024-0045**
Missouri East and West Service Territories)

STAFF’S COMPLIANCE TARIFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through counsel, and recommends that the Commission approve the proposed tariff sheets Spire Missouri, Inc. (“Spire”) filed on October 4, 2023, to take effect at least 10 days after the Commission’s order.

1. On October 4, 2023, Spire filed compliance its tariff sheet in tariff tracking number JG-2024-0045, bearing proposed effective dates of November 3, 2023. However, in a motion for expedited treatment, Spire requested effective dates of October 16, 2023.

2. Staff reviewed the tariff sheet and concludes that it complies with the Commission's October 4, 2023 order, as more fully detailed in Staff's Memorandum, attached hereto and incorporated herein by reference.

3. Staff does not object to expedited treatment which provides for at least 10 days between the issue dates and the effective dates of the Commission order approving the tariff sheet.¹

WHEREFORE, Staff requests that the Commission issue an order approving Spire’s proposed tariff sheets filed October 4, 2023, to take effect at least 10 days after the Commission’s order.

¹ See also State ex rel. Office of the Public Counsel v. Public Service Commission, 409 S.W.3d 522, 529 (Mo. App. 2013) stating that “any shortening of the date on which PSC orders will become effective to less than ten days is presumptively unreasonable.”

Respectfully submitted,

/s/ Eric Vandergriff

Eric Vandergriff

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Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 11th day of October, 2023.

/s/ Eric Vandergriff

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GO-2023-0432, Tariff Tracking No JG-2024-0045
Spire Missouri Inc., d/b/a Spire (Combined)

FROM: Michael J. Ensrud, Research/Data Analyst, Procurement Analysis

/s/ David M. Sommerer 10-11-23
Procurement Analysis/Date

SUBJECT: Staff Report and Recommendation Regarding Spire Missouri's ISRS
Tariff Submission in order to increase ISRS rates.

DATE: October 11, 2023

On October 04, 2023, the Commission issued "Order Approving Infrastructure System Replacement Surcharge" which authorizes:

Spire Missouri Inc., d/b/a Spire ("Spire Missouri" or "Company" or "Spire) to file a tariff sheet consistent with Staff's recommendation. The order states the following:

"The Commission Orders That:

1. Spire is authorized to change its Infrastructure System Replacement Surcharge (ISRS) sufficient to recover ISRS revenues in the amount of \$3,448,192 for Spire East, and \$8,944,014 for Spire West, for a total increase of \$12,392,206.
2. The tariff sheet filed by Spire on June 20, 2023, and assigned Tariff Tracking No. YG-2023-0224, is rejected
3. Spire is authorized to file new tariff sheets to recover the revenue authorized in this Order."

On October 4, 2023, Spire Missouri, in response to the aforementioned Commission order, filed both a cover letter and a revised tariff page.

On October 5, 2023, the Commission issued Order Directing Filing which contains the following:

'The Commission Orders That:

1. The Staff of the Commission shall file a Recommendation no later than October 11, 2023

STAFF'S ANALYSIS

This memo is Staff's response to Spire Missouri's responding to the aforementioned Commission's authorization (October 4, 2023 Order) and to Spire Missouri's submission of a tariff sheet and cover letter referenced above, filed on October 4, 2023.

In that submission, Spire Missouri filed a new tariff sheet (containing rates higher than those in place today) in order to recover the revenue requirement recommended by Staff in its "Staff Recommendation" of September 18, 2023. The tariff sheet is labeled "Fifth Revised Sheet No. 12." Spire Missouri accepts Staff's recommended rates as reflected in Appendix B-1 and Appendix B-2 from Staff's recommendation as being the proper rates to be implemented. In short, Spire Missouri's has filed ISRS rates that are both consistent with Staff's recommended ISRS rates and that are consistent with the Commission's October 4, 2023 order.

The Commission's¹ "Order Approving Infrastructure System Replacement Surcharge" makes reference to the Staff's incremental revenue requirement and to the cumulative revenue requirement², and Spire Missouri's filed rates are consistent with Staff's aforementioned Appendixes B-1 and B-2 in Staff's recommendation.

In addition, on October 4, 2023, in a separate EFIS submission, Spire Missouri's also filed "Spire Missouri Inc's Motion For Expedited Treatment". Spire is requesting an effective date for its submitted tariff of October 16, 2023.

Staff does not object to Spire Missouri's request for expedited treatment to the extent that the Commission approves a tariff effective date that provides for at least 10 days between the issue date and the effective date of the Commission order approving the tariff sheet. This is consistent with the September 28, 2018 Commission "Order Granting Expedited Treatment and Approving Tariff Filings in Compliance with Commission Order" in Case Nos. GO-2018-0309 and GO-2018-0310.

1 GO-2023-0432 / Order Approving Infrastructure System Replacement Surcharge / 10-4-2023

2 The Commission's order references the cumulative revenue requirement in the footnote on page 2.

As of the issuance of this memorandum, Spire Missouri is not delinquent on its FY 2023 assessments and Spire Missouri has filed its 2022 annual report with the Commission.

RECOMMENDATION

Based upon the rationale stated above, Staff recommends the Commission issue an order in this case that:

1. Approves Spire Missouri's ISRS tariff sheet:

P.S.C. MO No. 9 Sheet No. 12
Fifth Revised Sheet No 12 / Replacing Fourth Revised Sheet No. 12
(Submitted October 4, 2023)
2. Approves an effective date for the tariff sheet that is at least 10 days after the issue date of the Commission's Order approving the tariff.

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its Infrastructure System Replacement)
Surcharge in its Spire Missouri East and)
West Service Territories)

AFFIDAVIT OF MICHAEL J. ENSRUD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MICHAEL J. ENSRUD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in memorandum form; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.


MICHAEL J. ENSRUD

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 6th day of October 2023.




Notary Public