

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

In the Matter of the Application of Spire )  
Missouri, Inc. d/b/a Spire, for Permission )  
and Approval and a Certificate of )  
Convenience and Necessity to Construct, ) **File No. GA-2023-0441**  
Install, Own, Operate, Maintain, and )  
Otherwise Control and Manage a Natural )  
Gas Distribution System to Provide Gas )  
Service in Platte County, Missouri as an )  
Expansion of its Existing Certificated Areas )

**STAFF RESPONSE**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and states the following regarding Spire Missouri, Inc. d/b/a Spire (“Spire”) Spire’s Response to Staff’s Recommendation:

1. On September 28, 2023, Staff filed its *Staff Recommendation for Approval of Certificate of Convenience and Necessity* (“CCN”), which included five recommended conditions.

2. On October 2, 2023, Spire filed an updated tariff sheet with an effective date of November 1, 2023.

3. On October 9, 2023, Spire filed *Spire’s Response to Staff’s Recommendation*, whereas, agreeing to four of the five recommended conditions. Spire objected to condition four, which would require Spire to quantify the cost of assets included in rate base located in the area subject to the CCN request.

4. On October 11, 2023, the Commission issued an *Order Directing Staff Response* in which the Commission ordered Staff to file a response indicating whether Staff continues to recommend the condition in question as written in its September 28<sup>th</sup>

filing or whether, based on Spire's objection to the condition, Staff now recommends amending or deleting the condition.

5. Staff reviewed Spire's response to Staff's Recommendation, wherein, it states it would accept all of the conditions except for the fourth condition. Staff does not agree with Spire's objection to the fourth condition, as the implementation of the fifth condition also requires the implementation of the fourth condition. Therefore, Staff continues to recommend all of the conditions, including that "Spire shall quantify the cost of the assets included in rate base located in the area subject to this CCN request."

**WHEREFORE**, Staff respectfully requests the Commission approve Spire's Application for a CCN in Platte County, Missouri subject to the five conditions, including the fourth condition in question.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

Missouri Bar # 45718

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**ATTORNEY FOR STAFF OF THE  
PUBLIC SERVICE COMMISSION**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 12<sup>th</sup> day of October, 2023.

**/s/ Carolyn H. Kerr**