

**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’S MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), and through counsel, and for its *Motion for an Extension of Time* states as follows:

1. On June 28, 2023, Spire Missouri, Inc. d/b/a Spire (“Spire”), filed an Application for Certificate of Convenience and Necessity (“CCN”) for Platte County and Request for a Waiver (“Application”) with the Commission. Spire subsequently filed an Amended Application to correct the legal description of the area subject to the CCN request on August 7, 2023.
2. On September 28, 2023, Staff filed its Staff Recommendation that the CCN should be granted subject to five conditions.
3. On October 2, 2023, Spire filed a revised tariff sheet that includes the subject area of the CCN request, which would satisfy Staff’s third recommended condition. Subsequently, Spire filed a response to Staff’s recommendation on October 9, 2023; wherein, it disagreed with Condition Number 4.
4. On October 12, 2023, Staff responded that it did not agree with Spire’s objection to Condition Number 4, and continued to require all five conditions within the

approval of the CCN. In light of the disagreement, the Commission suspended the October 2, 2023 tariff and set a prehearing conference for November 15, 2023.

5. On November 2, 2023, Spire and Staff filed a Joint Filing to Amend Staff's Condition and Request to Cancel the Prehearing Conference, along with a request that the CCN be approved consistent with Staff's recommendation and the Joint Filing to Amend Staff's Condition Number 4. Furthermore, within the Wherefore Clause, the Parties requested the Commission direct Staff to issue a recommendation on Spire's tariff revision filed on October 2, 2023.

6. On November 6, 2023, the Commission issued an Order canceling the prehearing conference and directing Staff to issue a recommendation on the revised tariff by no later than November 13, 2023; however, there was no decision or approval of the CCN along with the five conditions at issue.

7. On November 8, 2023, an email was sent to the Regulatory Law Judge ("RLJ"), along with copying Spire counsel and Office of Public Counsel, requesting clarification on whether the CCN at issue should be approved prior to a recommendation on the revised tariff specifically related to the CCN that has not been approved or decided upon.

8. On November 9, 2023, clarification was received that the Order is requesting Staff to give its recommendation on the revised tariff prior to the Commission approving the CCN subject to the five conditions. Staff is uncomfortable with giving its recommendation on a revised tariff without first having an order approving the CNN subject to the five conditions.

9. Staff therefore requests an extension of time to file its recommendation on Spire's revised tariff that was filed on October 2, 2023, until such time a decision on approving the CCN, along with the conditions enumerated in Staff's recommendation and the amended condition filed on November 4, 2023, is made.

WHEREFORE, Staff respectfully requests the Commission grant Staff's Motion for an Extension of Time to file a recommendation on Spire's revised tariff until after Spire's Application for the CCN is approved subject to the enumerated conditions.

Respectfully submitted,

/s/ J. Scott Stacey

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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 9th day of November, 2023.

/s/ J. Scott Stacey