

**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 Approval of the Carbon Offset) **File No. GO-2024-XXXX**
Initiative.)

**APPLICATION OF SPIRE MISSOURI INC. FOR APPROVAL OF
THE CARBON OFFSET INITIATIVE AND
REQUEST FOR WAIVER FROM THE 60 DAY NOTICE RULE**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), by and through counsel and pursuant to 20 CSR 4240-2.060(1) and 20 CSR 4240-4.017(1), submits this Application for Approval of its Carbon Offset Initiative (this “Application”) and Request for Waiver from the 60 Day Notice Rule to the Missouri Public Service Commission (“Commission”). In support of its Application and Request, the Company respectfully states as follows:

APPLICANT

1. Spire Missouri is a public utility and gas corporation incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri 63101.
2. A Certificate of Good Standing evidencing Spire Missouri’s standing to do business in Missouri was submitted in Case No. GF-2022-0169 and is incorporated by reference herein for all purposes. The information in such Certificate is current and correct.

3. Spire Missouri is engaged in the business of distributing and transporting natural gas to customers in Missouri as a gas corporation subject to the jurisdiction of the Commission. Spire Missouri provides gas service in Missouri to customers in the City of St. Louis and the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, St. Genevieve, St. Francois, Madison, Butler, Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Cooper, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Newton, Pettis, Platte, Ray, Saline, Stone, and Vernon.

4. Other than cases that have been docketed at the Commission, Spire Missouri has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three years that involve customer service or rates. Spire Missouri has no annual report or assessment fees that are overdue.

5. All correspondence, communications, notices, orders, and decisions of the Commission with respect to this matter should be sent to the undersigned counsel and to:

Eric Bouselli
Manager, Regulatory Strategy & Forecasting
Spire Missouri Inc.
700 Market Street, 5th Floor
St. Louis, Missouri 63101
(314) 342-3336
Eric.Bouselli@spireenergy.com

6. Attached as **Appendix 1** is an affidavit from Eric Bouselli stating that all information contained in this application is true and correct to the best of his knowledge.

CARBON OFFSET INITIATIVE

7. Spire Missouri recognizes the globally-shared responsibility to create a

sustainable energy future as well as the importance of affordable, reliable, and sustainable natural gas service in achieving this goal. The Company also recognizes that customers have their own sustainability goals and interest in becoming carbon-neutral. However, customers may face high participation costs when attempting to be more environmentally focused. Assisting our customers in reaching their carbon-neutral goals is the purpose of this Application.

8. Spire Missouri is requesting approval of the Carbon Offset Initiative (the “Program”), which will provide customers the opportunity to voluntarily purchase a combination of environmental attributes to offset a portion of or all the carbon emissions from their natural gas usage. The specific environmental attributes are Renewable Thermal Certificates (“RTCs”), which are renewable natural gas specific environmental attributes, and Verified Carbon Offsets (“VCOs”).

9. As discussed further in the Direct Testimony of Eric Bouselli, environmental attribute markets are complex, making it difficult for individual customers to participate. Spire Missouri’s Program will allow customers the opportunity to offset their carbon emissions without the need for the expertise required to navigate these markets.

10. Spire Missouri seeks to offer this Program to Residential and Small General Service customers that meet certain eligibility requirements. Customers that elect to participate will select the dollar level they want to participate at, and a monthly charge corresponding to their selection will appear on their bills.

11. The Company will purchase environmental attributes based on the volumes subscribed and paid for by customers from a vendor. Anew Climate, which has extensive history and experience in this field, has been selected and will be the source of the initial RTCs and VCOs purchased by Spire Missouri under this Program.

12. The tariff setting forth the proposed Carbon Offset Initiative and the Direct Testimony of Eric Bouselli, supporting and detailing the Program, have been filed concurrently with this Application.

REQUEST FOR WAIVER FROM 60-DAY NOTICE RULE

13. Commission Rule 20 CSR 4240-4.017(1) provides, in part, as follows:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

14. Rule 20 CSR 4240-4.017(1)(D) permits a party to request a waiver of the above cited rule for good cause. The rule provision specifically provides that good cause may be established by submitting a verified declaration that the filing party has had no communication with the office of the Commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. The Company interprets this to mean that good cause is established if the filing party has had no communication with a member of the office of the Commission outside of pleadings or other public communications. Subject to that understanding, the Company has attached, as **Appendix 2**, the verified declaration of Eric Bouselli that neither the Company nor any person or entity acting on behalf of the Company, has had a communication with a member of the office of the Commission in the last 150 days regarding any substantive issues that are likely to arise in the case. For that reason, the Company requests that the Commission grant a waiver of the 60-day notice requirement for Spire Missouri's Application for the Carbon Offset Initiative.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that the Commission approve Spire Missouri’s Carbon Offset Initiative and order any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing Application of Spire Missouri was served to Staff of the Missouri Public Service Commission and the Office of the Public Counsel this 29th day of November 2023 by electronic mail.

/s/Julie Trachsel

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AFFIDAVIT

State of Missouri)
) SS
County of St. Louis)

I, Eric Bouselli, being of lawful age and first duly sworn, deposes and states:

- 1. I am the Manager of Regulatory Strategy & Forecasting for Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri, 63101.
- 2. I am authorized to make the following declarations on behalf of Spire Missouri Inc. and have knowledge of the matters stated herein.
- 3. As required by Commission Rule 20 CSR 4240-2.060(1)(M) and under penalty of perjury, I hereby declare that the matters and things stated in the foregoing Application are true and correct to the best of my knowledge and belief.

Eric Bouselli
Eric Bouselli (Nov 29, 2023 15:40 CST)
Eric Bouselli

November 29, 2023

Dated

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VERIFIED DECLARATION

State of Missouri)
) SS
County of St. Louis)

I, Eric Bouselli, state that I am a Manager, Regulatory Strategy & Forecasting for Spire Missouri Inc. I am authorized to make this verification on behalf of Spire Missouri Inc. Under the penalty of perjury, I hereby swear and affirm that I have read the foregoing Request for Waiver and declare that other than pleadings or other public communications, Spire Missouri Inc. has had no communication with the office of the Commission, within the prior one hundred and fifty (150) days regarding any substantive issue likely to be in the above referenced case.

Eric Bouselli
Eric Bouselli (Nov 29, 2023 15:40 CST)

Eric Bouselli

November 29, 2023

Dated