

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

In the Matter of the Application of Spire)	<u>Case No. GO-2024-0180</u>
Missouri Inc. d/b/a Spire for Approval of the)	<u>Tariff No. JG-2024-0073</u>
Carbon Offset Initiative)	

STAFF’S MOTION FOR ADDITIONAL TIME AND SUSPENSION OF TARIFFS

COMES NOW the Staff of the Missouri Public Service Commission and in response to the Commission’s November 30, 2023, *Order and Notice Setting Time for Responses* (“Order”) submits its *Staff’s Motion for Additional Time and Suspension of Tariff*, and in support thereof states as follows:

1. On November 29, 2023, Spire Missouri Inc. d/b/a Spire (“Spire”) filed an application for approval of a Carbon Offset Initiative and a request for waiver from the 60 day notice requirement of 20 CSR 4240-4.017. Attached to Spire Missouri’s Application is the direct testimony of Eric Bouselli and P.S.C. MO. No. Original SHEET No. R-30.28 through R-20.32, bearing an effective date of December 29, 2023.

2. On November 30, 2023, the Commission ordered that any person wishing to intervene in this matter, must do so by December 11, 2023, and directed Staff to file a recommendation regarding Spire’s tariff sheets, Tariff File No. JG-2024-0073, no later than December 13, 2023.

3. Staff is in the process of reviewing the application, testimony in support of the application, and the multiple tariff sheets; however, Staff will be issuing data requests to aid in its review, possible follow-up date requests, and have discussions with Spire. In order to provide sufficient time to analyze the acquired data and information from Spire and complete its investigation, Staff requests an additional 90 days in which to complete its review and file its recommendation.

4. Staff proposes to submit its recommendation by March 13, 2024.
5. Staff further requests the Commission suspend Spire's Tariff Sheets P.S.C. MO. No. Original SHEET No. R-30.28 through R-20.32, Tariff File No. JG-2024-0073, bearing an effective date of December 29, 2023, until such time Staff has had sufficient time to investigate and file its recommendation on this matter.

WHEREFORE, Staff respectfully submits this Motion for Additional Time and Suspension of Tariffs for the Commission's information and consideration, and hereby prays the Commission order Staff to file its recommendation in this matter on March 13, 2024; Suspend Spire's Tariff Sheets in JG-2024-0073; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

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**Attorney for the Staff of the
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 4th day of December, 2023.

/s/ J. Scott Stacey