

**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 a Variance of)
its Tariff Rules and Regulations)
for Resale of Natural Gas)

Case No. GE-2023-0393

STATUS REPORT AND REQUEST FOR DISCOVERY CONFERENCE

COMES NOW the Staff of the Missouri Public Service Commission and for its *Status Report* hereby states:

1. On May 19, 2023, Spire Missouri Inc. d/b/a Spire filed its *Application* requesting a variance from its tariff provisions related to the resale of natural gas and a waiver of the 60-day notice rule in connection with the new KCI Airport terminal built by the City of Kansas City. Staff has diligently sought information in this matter in an attempt to ascertain the structure of the natural gas system at the airport.

2. Spire has provided responses to all of Staff's data requests to date. The City of Kansas City has provided some response to all but three of Staff's requests, but several responses are brief or vague and do not respond to Staff's questions. Staff has made every attempt to give the City time to respond as it does not regularly practice before the Commission. However, the investigation cannot be completed without additional information. Staff therefore, asks the Commission to order a discovery conference for this matter to permit Staff to identify again to the City which data requests remain unanswered and which responses are incomplete or vague.

3. In light of this difficulty in obtaining information, Staff does not have sufficient information to render a recommendation on granting or denying the waiver at this time. Therefore, Staff requests additional time to continue its investigation and seek the

information needed to make an informed recommendation. Staff asks to extend the date by which to file a recommendation for an additional three months, or March 13, 2024.

WHEREFORE, Staff prays that the Commission will accept this *Status Report*; order a discovery conference in this matter; grant an extension to file Staff's recommendation no later than March 13, 2024; and provide such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Whitney Scurlock

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, to all parties or their representatives pursuant to the Service List maintained by the Commission's Data Center for this file, on this 13th day of December, 2023.

/s/Whitney Scurlock