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

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Joshua Michael Kearney		
	Complainant,	
v.		
Spire Missouri Inc. d/b/a Spire,		
	Respondent	

File No. GC-2024-0172

## **ANSWER**

**COMES NOW** Spire Missouri Inc. ("Respondent") and submits its Answer to the Complaint filed by Joshua Michael Kearney ("Complainant"), stating the following:

1. Respondent admits its address is 700 Market Street, St. Louis, MO, 63101.

2. Respondent admits it is a public utility under the jurisdiction of the Missouri Public Service Commission.

3. Respondent denies that it has engaged in unjust enrichment and is avoiding regulatory compliance.

4. Respondent admits that it is charging customers a delivery charge for gas used, which is based on the number of CCFs used, in accordance with its tariffs, specifically Sheet No.2, approved by the Missouri Public Service Commission.

5. Respondent admits that it is also charging customers a Purchased Gas Adjustment ("PGA"), which reflects the current estimate of the annualized cost of various natural gas services purchased by the Company, including an Actual Cost Adjustment to reflect the annual reconciliation of actual purchased gas and pipeline service costs, in accordance with its tariffs, specifically Sheets No. 11 through 11.8, approved by the Missouri Public Service Commission.

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6. Respondent denies that the two charges result in Complainant being charged twice for the same service.

**WHEREFORE**, Respondent respectfully requests that the Commission accept this answer and grant 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**

I do hereby certify that a true and correct copy of the foregoing document has been sent by

electronic mail to all parties of record on this 19th day of December, 2023.

/s/ J. Antonio Arias

J. Antonio Arias