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-2024-0180
Initiative.)	Tariff No. JG-2024-0073

SPIRE'S RESPONSE TO STAFF'S RECOMMENDATION AND REQUEST

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), by and through counsel hereby submits its response to the Staff Recommendation filed by the Staff of the Missouri Public Service Commission ("Staff") on March 13, 2024, stating the following:

- 1. On November 29, 2023, Spire Missouri filed its Application for Approval of the Carbon Offset Initiative and associated tariff with the Missouri Public Service Commission ("Commission").
- 2 On November 30, 2023, the Commission issued its order directing Staff to file a recommendation regarding the tariff by December 13, 2023.
- 3. On December 4, 2023, Staff filed its Motion for Additional Time and Suspension of Tariffs, requesting an extension until March 13, 2024, to submit its recommendation.
- 4. On December 21, 2024, the Commission granted Staff's request, directing Staff to issue its recommendation no later than March 13, 2024. The Commission also set the deadline to respond to Staff's recommendation as March 25, 2024. The Commission also directed the parties to jointly file a proposed procedural schedule, or a statement indicating no further procedural schedule is needed, no later than April 1, 2024.
 - 5. One party has intervened in this docket. Missouri Industrial Energy Consumers

("MIEC") filed its Application to Intervene on December 6, 2023, and which was granted on December 20, 2023.

- 6. Staff filed its Recommendation on March 13, 2024. Staff recommended approval of Spire Missouri's Application subject to modifications to the Carbon Offset Initiative ("Program") tariff and recommended that the Company provide specific information on the Program to the Commission in this docket on an annual basis.
- 7. Spire Missouri agrees to the annual reporting requirements recommended by Staff. Spire has reviewed Staff's modifications to the Program tariff and provides responses to those modifications in **Appendix A**, and provides additional redlines to the tariff draft filed by Staff with its recommendation in **Appendix B**.
- 8 On Monday, March 25, 2024, Spire contacted Staff and MIEC regarding a request to obtain an additional 60 days for the parties to discuss Staff's recommendations, and Spire's responses. This request would also satisfy the Commission's order to either file a proposed procedural schedule, or statement indicating no further procedural schedule is needed, no later than April 1, 2024. Spire received a response from Staff stating that it approved of the request, however, has yet to receive a response from MIEC. At this time, Spire would request that the Commission allow the parties additional time to discuss and direct a status update be filed no later than May 24, 2024, and will provide notice to the Commission of whether MIEC also agrees to this request.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that the Commission accept this response, direct a status update be filed by May 24, 2024, 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 this filing was served on the Staff of the Missouri Public Service Commission, the Office of the Public Counsel, and all parties of record this 25th day of March, 2024 by electronic mail.

/s/Julie Trachsel