

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

In the Matter of Spire Missouri Inc.’s Request)
for Authority to Implement a General Rate)
Increase for Natural Gas Service Provided) Case No. GR-2021-0108
In the Company’s Missouri Service Areas)

LEGAL SERVICES OF EASTERN MISSOURI, INC.’S STATEMENT OF POSITIONS

COMES NOW, Legal Services of Eastern Missouri, Inc. (“LSEM”), and for its *Statement of Positions* states:

51: Residential Rate design

LSEM recommends the Commission order that the residential customer charge be reduced to \$16 for all Spire residential customers because such a reduction would allow customers, especially low-income customers, to have more control over the cost of their natural gas service.¹

53. Low income Programs

LSEM concurs with and adopts and supports the Statement of Positions with respect to Low income Programs set forth in the Missouri Office of Public Counsel’s Statement of Positions filed in this case on July 19, 2021. LSEM further recommends that the Commission order the following additional modifications to the Company’s low income programs:

- Increase the maximum arrearage match to \$500 (from the current \$300);
- Permit households to remain in the “Payment Partners” program as long as they do not have “more than two” consecutive late payments, and regardless of whether or not those payments are full and complete; and

¹ Hutchinson, Direct, pg. 7 lns 5-18.

- The Company should work with interested stakeholders during the collaborative bi-annual planning meetings to discuss ways to make the Critical Needs Program for medically vulnerable customers transparent and easily accessible and to promote the program to customers as well as medical and social work professionals.

Other Issues. LSEM takes no position on any other issue set forth in the *List of Issues* filed by Commission Staff on July 16, 2021, but reserves the right to take a position on all such issues based on evidence presented at hearing.

Respectfully Submitted,

/s/ Paul A. Barrs
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing has been mailed, emailed, or hand-delivered to all counsel of record on this 19th day of July 2021.

/s/ Paul A. Barrs