BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Spire Missouri Inc. d/b/a Spire to Change its Infrastructure System Replacement Surcharge in its Spire Missouri East and West Service Territories

Case No. GO-2024-0214

<u>SPIRE MISSOURI INC'S</u> MOTION FOR EXPEDITED TREATMENT

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), on behalf of itself and its two operating units, Spire Missouri East ("Spire East") and Spire Missouri West ("Spire West") and, pursuant to Rule 20 CSR 4240-2.080 (14) submits this Motion for Expedited Treatment to the Missouri Public Service Commission ("Commission") to permit the Revised Tariff Sheet filed by the Company on this date to become effective on May 8, 2024. In support thereof, the Company states as follows:

1. On April 16, 2024, Staff of the Missouri Public Service Commission ("Staff") issued its *Staff Recommendation*. Staff recommends that the Infrastructure System Replacement Surcharge ("ISRS") revenue requirements be increased by \$6,097,529 and \$10,680,422 for Spire East and Spire West, respectively.

2. On April 18, 2024, Spire Missouri filed its *Response to Staff Recommendation* accepting Staff's recommended revenue requirements. No other party in this docket has filed a response to the *Staff Recommendation* or to Spire Missouri's *Response to Staff Recommendation*.

3. On April 24, 2024, the Commission issued its *Order Approving Infrastructure System Replacement Surcharge*, in which it rejected the tariff sheet originally filed by Spire Missouri on January 17, 2024, and authorized the Company to file a tariff revision sufficient to recover ISRS revenues consistent with Staff's recommendations. Consistent with the statutory deadline set forth in the ISRS Statute (*see* Sections 393.1009 RSMo. to 393.1015 RSMo.) for processing ISRS applications, the Commission made its Order effective on May 4, 2024.

4. In compliance with the Commission's Order, the Company has contemporaneously filed, with this Motion for Expedited Treatment, a revised tariff sheet to recover the ISRS revenues authorized by the Commission.

5. The purpose of this Motion for Expedited Treatment is to request the Commission approve the Company's revised tariff sheet filed on this date to become effective on May 8, 2024, if practical.

6. Commission Rule 20 CSR 4240-2.080 (14) (B) requires that a motion for expedited treatment set out the "harm that will be avoided, or the benefit that will accrue," and include "a statement of the negative effect, or that there will be no negative effect on the party's customers or the general public" if the Commission acts as requested. Spire Missouri submits that the benefit that will accrue by expedited approval is that the Company will be able to timely recover the investments that it has made into maintaining its safe and reliable system for its customers. The harm that will be avoided is delayed recovery of these prudent infrastructure investments. At the same time, there will be no negative impact on the Company's customers or the general public if the Commission grants such relief. Furthermore, as the Commission has adopted Staff's recommended ISRS revenue requirements, there will be no additional burden on Staff, or any other party, to review the revised tariff sheet before the desired effective date. For all of these reasons, Spire Missouri submits that there is good cause for the Commission to approve the proposed tariff to become effective on May 8, 2024.

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7. This pleading was filed as soon as it could have been following the Company's preparation and filing of the revised tariff sheet implementing the terms of the Order issued by the Commission in this case on April 24, 2024.

WHEREFORE, for all the foregoing reasons, Spire Missouri respectfully requests that the Commission consider and grant this Motion for Expedited Treatment and approve the revised tariff sheet to become effective on May 8, 2024.

Respectfully submitted,

/s/ J. Antonio Arias

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served to the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 24th day of April, 2024.

/s/ Julie Johnson