

**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 Certificate of )  
Convenience and Necessity to Construct, )  
Install, Own, Operate, Maintain and )  
Otherwise Control and Manage a Natural )  
Gas Distribution System in Newton County )  
Missouri as an Expansion of its Existing )  
Certified Areas )

**File No. GA-2024-0257**

**MOTION FOR EXTENSION OF TIME  
TO FILE STAFF RECOMMENDATION**

**COMES NOW**, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Motion for Extension of Time to File Staff Recommendation*, states as follows:

1. On March 22, 2024, Spire Missouri, Inc. (“Spire”) filed an application requesting a Certificate of Convenience and Necessity (CCN) to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide natural gas service in Newton County, Missouri as a further expansion of its existing certificated area; and requesting a waiver from the notice provisions of Commission Rule 20 CSR 4240.4.017(1).

2. On March 25, 2024, the Commission issued an *Order Directing Notice, Setting Intervention Deadline, and Directing Staff Recommendation*. The Order directed Staff to file its recommendation regarding Spire’s *Application* or an extension request no later than May 9, 2024.

3. Staff has and may continue to issue data requests to aid in its review, provide feedback, and continue discussions with Spire. However, Spire's responses to Staff initial rounds of data requests have spurred the need for further investigation and additional discovery.

4. Further, as is common practice in cases regarding the expansion of existing natural gas distribution systems, Staff requests additional time to review the information provided thus far and determine if further information is needed.

5. In order to provide sufficient time to conduct further discovery, analyze newly acquired data and information from Spire, and complete its investigation, Staff requests an additional 30 days in which to complete and file its recommendation. Staff requests an extension to June 6, 2024. Staff will attempt to complete its review prior to any newly-established filing date.

6. Counsel for Spire and the Office of the Public Counsel have been contacted regarding this motion and neither party objects to the granting of an extension of time in this matter.

7. This motion is made in the interest of justice and without the intent to unreasonably delay or hinder these proceedings in any manner.

**WHEREFORE**, Staff respectfully submits this *Motion for Extension of Time to File Staff Recommendation* for the Commission's information and consideration and prays the Commission grant Staff an additional 30 days to June 6, 2024, within which to file its recommendation in this matter; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

**/s/ Tracy D. Johnson**

Tracy D. Johnson #65991

Senior Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, Mo 65102-0360

(573) 526-5343

[tracy.johnson@psc.mo.gov](mailto:tracy.johnson@psc.mo.gov)

Attorney for the Staff of the

Missouri Public Service Commission

### **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, on this 3<sup>rd</sup> day of May, 2024, to all counsel of record.

**/s/ Tracy D. Johnson**