

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

In the Matter of the Application of Spire)
Missouri Inc. for a Certificate of Convenience)
and Necessity to Construct, Install, Own, Operate)
Maintain, and Otherwise Control and Manage a) Case No. GA-2024-0243
Natural Gas Distribution System in Cass County,)
Missouri As an Expansion of its Existing)
Certified Areas.)

**SPIRE MISSOURI RESPONSE TO STAFF’S
RECOMMENDATION**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”), by and through its undersigned counsel, and respectfully submits this *Response to Staff’s Recommendation*, stating the following:

1. On March 8, 2024, Spire Missouri filed its application with the Missouri Public Service Commission (“Commission”) for a certificate of convenience and necessity to install, own, construct, operate, control, manage, and maintain a natural gas distribution system to provide gas in Cass County, Missouri, as an addition to Spire’s existing certificated area. The Company also requested a waiver from the notice provisions of Rule 20 CSR 4240-4.017(1).

2. On March 20, 2024, the Commission issued its order directing notice of the application, setting an intervention deadline of April 9, 2024, and directing Staff of the Commission (“Staff”) to issue its recommendation no later than May 3, 2024.

3. On May 3, 2024, Staff filed its recommendation. Staff recommends that the Commission approve Spire Missouri’s application for the certificate of convenience and necessity requested and agrees good cause exists for waiving the notice provisions of Rule 20 CSR 4240-4.017(1). Staff also recommends that the Commission order the Company to file an updated tariff sheet incorporating Section 32, Township 46 North, Range 32 West of Cass

County into approved certificated territory.

4. Spire Missouri agrees with Staff's recommendations. There is a need for service, and the Company both has the financial ability to provide service to the requested area and is already providing service to customers in Cass County adjacent to the requested area. Additionally, Spire Missouri has a proven record of safe and reliable service. It is therefore in the public interest to approve this application, as recommended by Staff.

WHEREFORE, Spire Missouri respectfully requests that the Commission approve the Company's application for a certificate of convenience and necessity, consistent with Staff's recommendations, grant the Company's request for a waiver of the notice requirement of 20 CSR 4240-4.017(1), 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 hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 7th day of May, 2024.

/s/ Julie Johnson
