

**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-2024-0257  
Natural Gas Distribution System in Newton )  
County, Missouri as an Expansion of its )  
Existing Certified Areas. )

**SPIRE MISSOURI’S 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 22, 2024, Spire Missouri filed its application with the Missouri Public Service Commission (“Commission”) for a certificate and convenience and necessity to install, own, construct, operate, control, manage, and maintain a natural gas distribution system to provide gas in Newton County, Missouri, as an addition to Spire’s existing certificated area. The Company also requested a waiver from the notice provisions of Commission Rule 20 CSR 4240-4.017(1).

2. On March 25, 2024, the Commission issued its order directing notice of the application, setting an intervention deadline of April 15, 2024, and directing Staff of the Commission (“Staff”) to issue its recommendation no later than May 9, 2024.

3. On May 3, 2024, Staff requested until June 6, 2024, to file its recommendation, which the Commission granted. Spire Missouri did not object to this request.

4. On June 6, 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 recommended the following conditions:

- Spire shall continue working on the internal audit report of its processes and procedures regarding compliance with Commission Rule 20 CSR 4240-3.205 Filing Requirements for Gas Utility Applications for Certificates of Convenience and Necessity to ensure all of its regulated area of operation has been certified by the Commission.
- Spire shall provide its internal audit report to the Commission prior to filing for its next general rate case.
- Spire shall file an updated tariff sheet incorporating Section 16 and Section 17, Township 26 North, Range 33 West of Newton County.

5. Spire Missouri agrees with Staff's recommendation and accepts Staff's conditions.

There is a need for service, the Company is qualified to provide service, the Company has the financial ability to provide the service, and the proposed service is economically feasible. The Company also has a proven record of safe and reliable service. It is therefore in the public interest to approve this application, as recommended by Staff.

6. Spire Missouri also recognizes Staff's concerns with natural gas service being provided beyond the boundaries of its certificated area. Spire Missouri is developing its internal processes and procedures to address this issue, which will identify assets outside of its certificated area and ensure that no future assets are installed outside of its certificated area. Spire Missouri would note the early stages of this process identified the need for the application that is the subject of this docket.

**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 and conditions, 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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Matthew Aplington, MoBar #58565  
General Counsel  
Spire Missouri Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
(314) 342-0785 (Office)  
Email: matt.aplington@spireenergy.com

Sreenivasa Rao Dandamudi, MoBar #50734  
Director and Associate General Counsel – Regulatory  
Spire Missouri Inc  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
(314) 342-0702 (Office)  
Email: sreenu.dandamudi@spireenergy.com

J. Antonio Arias, MoBar #74475  
Counsel, Regulatory  
Spire Missouri Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
(314) 342-0655 (Office)  
Email: antonio.arias@spireenergy.com

**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 17<sup>th</sup> day of June, 2024.

*/s/ J. Antonio Arias*

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