

**1BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Spire Missouri            )  
Inc. d/b/a Spire for Approval of the Carbon Offset        )  
Initiative.                                                                    )  
                                                                                          File No. GO-2024-0180  
                                                                                          Tariff No. JG-2024-0073

**FULL AND UNANIMOUS STIPULATION AND AGREEMENT**

COME NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”) and Staff of the Missouri Public Service Commission (“Staff”), (collectively, the “Parties”) respectfully submit this *Full and Unanimous Stipulation and Agreement* (this “Stipulation”) to resolve this docket, stating the following:

1. On November 29, 2023, Spire Missouri filed its Application for Approval of the Carbon Offset Initiative and associated tariff with the Missouri Public Service Commission (“Commission”).
2. On November 30, 2023, the Commission issued its order directing Staff to file a recommendation regarding the tariff by December 13, 2023.
3. On December 4, 2023, Staff filed its Motion for Additional Time and Suspension of Tariffs, requesting an extension until March 13, 2024, to submit its recommendation.
4. On December 21, 2023, the Commission granted Staff’s request, directing Staff to issue its recommendation no later than March 13, 2024. The Commission also set the deadline to respond to Staff’s recommendation as March 25, 2024. The Commission also directed the parties to jointly file a proposed procedural schedule, or a statement indicating no further procedural schedule is needed, no later than April 1, 2024.
5. Staff filed its Recommendation on March 13, 2024. Staff recommended approval

of Spire Missouri's Application subject to modifications to the Carbon Offset Initiative ("Program") tariff and recommended that the Company provide specific information on the Program to the Commission in this docket on an annual basis.

6. On March 25, 2024, Spire Missouri filed its response to Staff's Recommendation, and requested until May 24, 2024, to hold discussions with Staff to resolve this docket. The Commission granted this request and ordered a status update be filed by May 24, 2024. Spire Missouri filed a similar request on May 24, 2024. The Commission granted this request and ordered a status update be filed by June 24, 2024.

7. Spire Missouri and Staff have held discussions on the Carbon Offset Initiative and exchanged edits on Spire Missouri's proposed tariff filed with its application opening this docket. The Parties have reached an agreement on the Carbon Offset Initiative and now file this Stipulation.

8. The Parties agree that the specimen tariff, filed as **Appendix 1**, represents the Parties' complete agreement on how Spire Missouri will operate the Carbon Offset Initiative.

9. The Parties agree that Appendix 1 resolves Staff's recommendations and captures Staff's desired reporting requirements.

10. The Parties agree that the Commission should order Spire Missouri to file a compliance tariff consistent with Appendix 1.

11. The Office of the Public Counsel ("OPC") and the Missouri Industrial Energy Consumers ("MIEC") have been advised of this Stipulation. OPC does not object to the stipulation. No response was received from MIEC.

#### **GENERAL PROVISIONS OF AGREEMENT**

12. Limitation of Scope: This Stipulation is being entered into for the purpose of

disposing of the issues specifically addressed herein. In presenting this Stipulation, none of the Parties shall be deemed to have approved, accepted, agreed, consented or acquiesced to any procedural principle, and none of the Parties shall be prejudiced or bound in any manner by the terms of this Stipulation, whether approved or not, in this or any other proceeding, other than a proceeding limited to the enforcement of the terms of this Stipulation, except as otherwise expressly specified herein. The Parties further understand and agree that the provisions of this Stipulation relate only to the specific matters referred to in this Stipulation, and no Party waives any claim or right which it otherwise may have with respect to any matter not expressly provided for in this Stipulation. The Parties further understand and agree that no Party to this Stipulation shall assert the terms of this Stipulation as a precedent in any future proceeding.

13. Interdependence and Non-Severability: This Stipulation has resulted from negotiations and the terms hereof are interdependent. If the Commission does not approve this Stipulation in total or approves it with modifications or conditions to which a Party objects, then this Stipulation shall be void and no Party shall be bound by any of its provisions. The agreements herein are specific to this proceeding and are made without prejudice to the rights of the Parties to take other positions in other proceedings except as otherwise noted herein. If the Commission does not unconditionally approve this Stipulation without modification, and notwithstanding its provision that it shall become void, neither this Stipulation, nor any matters associated with its consideration by the Commission, shall be considered or argued to be a waiver of the rights that any Party has for a decision in accordance with Section 536.080, of the Revised Statutes of Missouri (“RSMo”) or Article V, Section 18, of the Missouri Constitution, and the Parties shall retain all procedural and due process rights as fully as though this Stipulation had not been presented for approval, and any suggestions or memoranda, testimony or exhibits that have been

offered or received in support of this Stipulation shall become privileged as reflecting the substantive content of settlement discussions and shall be stricken from and not be considered as part of the administrative or evidentiary record before the Commission for any further purpose whatsoever.

14. Waiver of Procedural Rights: If the Commission unconditionally accepts the specific terms of this Stipulation without modification, the Parties waive, with respect to the issues resolved herein, their respective rights as follows: (1) to call, examine and cross-examine witnesses pursuant to Section 536.070(2), RSMo.; (2) to present oral argument and/or written briefs pursuant to Section 536.080.1, RSMo.; (3) to the reading of the transcript by the Commission pursuant to Section 536.080.2, RSMo.; (4) to seek rehearing pursuant to Section 386.500, RSMo.; and (5) to judicial review pursuant to Section 386.510, RSMo., provided however that the Verified Applications and Updates submitted by Spire Missouri on behalf of Spire East and Spire West shall be received into evidence for the sole purpose of providing an evidentiary foundation for this Stipulation. These waivers apply only to a Commission order respecting this Stipulation issued in this above-captioned case and do not apply to any issues or matters raised in any prior or subsequent Commission order, or any issue or other matters not explicitly addressed by this Stipulation.

15. Merger and Integration: This Stipulation and Appendix 1 contain the entire agreement of the Parties concerning the issues addressed herein. The intent of the Parties to this Stipulation has been fully and exclusively expressed in this document and the attached appendix.

**WHEREFORE**, the Parties respectfully request the Commission approve this Stipulation, order Spire Missouri to file a compliance tariff, and order any other relief as is just and reasonable.

Respectfully submitted,

*/s/ J. Antonio Arias*

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*/s/ J. Scott Stacey*

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**ATTORNEY FOR STAFF OF THE  
PUBLIC SERVICE COMMISSION**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent either by mail or electronic mail to all parties of record on this 28th day of June, 2024.

*/s/ J. Antonio Arias*

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J. Antonio Arias