BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| File No. GA-2024-0361 |
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STAFF'S STATUS REPORT AND 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 *Staff Status Report and Motion for Extension of Time to File Staff Recommendation*, states as follows:

- 1. On June 6, 2024, Spire Missouri, Inc. d/b/a Spire ("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 throughout the State of Missouri and to acquire natural gas assets of Southern Star Central Gas Pipeline, Inc. (Southern Star"); and requesting a waiver from the notice provisions of Commission Rule 20 CSR 4240.4.017(1).
- 2. On June 21, 2024, the Commission issued an *Order and Notice*. The *Order* directed Staff to file its recommendation regarding Spire's *Application* or a status report when it expects to file a recommendation no later than July 16, 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's initial rounds of data requests have spurred the need for further investigation and additional discovery.

- 4. 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 60 days, in which to complete and file its recommendation. Staff requests an extension to September 16, 2024. Staff will attempt to complete its review prior to any newly-established filing date.
- 5. 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.
- 6. 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 its *Staff Status Report and Motion for Extension of Time to File Staff Recommendation* for the Commission's consideration and prays the Commission grant Staff an additional 60 days to September 16, 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 under the circumstances.

Respectfully submitted,

/s/ J. Scott Stacev

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ATTORNEY FOR STAFF OF THE PUBLIC SERVICE COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 15th day of July, 2024.

/s/ J. Scott Stacey