## 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	) File No. GA-2024-0361
Gas Distribution Systems Throughout the	)
State of Missouri and for Approval to Acquire	
Natural Gas Assets of Southern Star Central	)
Gas Pipeline, Inc.	)

## 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. On July 15, 2024, Staff filed *Staff Status Report and Motion for Extension* in which Staff stated that it had submitted data requests to Spire and that Staff was in the process of reviewing the data request responses received from Spire. Staff also anticipated it would need to send follow up data requests. As such, Staff requested an extension of time to file its recommendation. Staff requested the Commission permit Staff to file its recommendation in this matter no later than September 16, 2024.
- 4. On July 17, 2024, the Commission granted Staff's Motion for an Extension of Time and issued an *Order and Notice Directing Filing of Staff Recommendation*. The *Order* directed Staff to file its recommendation regarding Spire's *Application* no later than September 16, 2024.
- 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 37 days, in which to complete and file its recommendation. Staff requests an extension to October 25, 2024. Staff will attempt to complete its review prior to any newly-established filing date.
- 6. Counsel for Spire has been contacted regarding this motion does not object 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 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 37 days to October 25, 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 13<sup>th</sup> day of September, 2024.

/s/ J. Scott Stacey