

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

In the Matter of the Application of Spire	)	
Missouri Inc. d/b/a Spire to Change its	)	
Infrastructure System Replacement	)	Case No. GR-2025-0026
Surcharge in its Spire Missouri East and	)	
West Service Territories	)	

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

Spire Missouri Inc. (“Spire Missouri” or “the Company”) respectfully submits this Response to the Recommendation of the Staff of the Missouri Public Service Commission (“Staff”) as follows:

1. Spire Missouri submitted its Verified Application and Petition to Change its Infrastructure System Replacement Surcharge for its Spire Missouri East and West Service Territories and Request for Waiver from 60-Day Notice Rule (“Application”) on July 19, 2024 for a combined revenue requirement of \$17,728,930.

2. On July 24, 2024, the Missouri Public Service Commission (“Commission”) ordered its Staff to evaluate Spire Missouri’s Application and report its findings in a filed recommendation by October 17, 2024. The Commission also directed the Office of the Public Counsel (“OPC”) and any other party to file any objection to Spire Missouri’s Application or request for a hearing by October 17, 2024.

3. Staff filed its Staff Recommendation on October 17, 2024, and, at the time of this filing, no party has filed an objection to Spire Missouri’s Application or the Staff Recommendation or requested a hearing.

4. In this case, Staff recommends that the Infrastructure System Replacement Surcharge (“ISRS”) revenue requirements be increased by \$5,672,271 for Spire Missouri East and \$11,079,394 for Spire Missouri West, resulting in a total increase of \$16,751,665.

5. In the Company's ISRS case, Case No. GO-2023-0203, which immediately followed its most recent rate case, Staff recommended an ISRS revenue requirement of \$3,296,620 for Spire Missouri East and \$4,423,732 for Spire Missouri West, for a total revenue requirement of \$7,720,352. The Company accepted Staff's recommendation.

6. In Case No. GO-2023-0432, the Company's following ISRS case, Staff recommended an ISRS revenue requirement of \$3,448,192 for Spire Missouri East and \$8,944,014 for Spire Missouri West, for a total revenue requirement of \$12,392,206. The Company accepted Staff's recommendation.

7. In Case No. GO-2024-0214, the Company's most recent finalized ISRS case, Staff recommended an ISRS revenue requirement of \$6,097,529 for Spire Missouri East and \$10,680,422 for Spire Missouri West, for a total revenue requirement of \$16,777,951. The Company accepted Staff's recommendation.

8. The cumulative ISRS revenue requirement recommended by Staff is \$18,514,612 for Spire Missouri East and \$35,127,562 for Spire Missouri West, for a total annual revenue increase of \$53,642,174.

9. After reviewing Staff's recommendations, the Company accepts Staff's proposed revenue requirements for Spire Missouri East and Spire Missouri West. The Company appreciates Staff's diligence in this case.

10. Spire respectfully requests the Commission's expedience in taking this matter under consideration, so that the Company may receive timely recovery of its investments into maintaining its safe and reliable system.

**WHEREFORE**, Spire Missouri submits this Response and requests that the Commission approve the revenue requirements recommended by Staff 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**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record on this 21<sup>st</sup> day of October , 2024.

*/s/ J. Antonio Arias*

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J. Antonio Arias