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 Natural Gas Distribution)	File No. GA-2025-0181
Systems in Cedar County, Missouri as an)	
Expansion of its Existing Certified Areas)	

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 December 10, 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 in Cedar County, Missouri as an expansion of its existing certified areas; and requesting a waiver from the notice provisions of Commission Rule 20 CSR 4240.4.017(1).
- 2. On December 16, 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 January 16, 2025.
- 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 March 17, 2025. Staff will attempt to complete its review prior to any newly-established filing date.
- 5. 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 March 17, 2025, 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,

<u>/s/ Paul T. Graham</u>

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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 January, 2025.

/s/ Paul T. Graham