

**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-2025-0206
Surcharge in its Spire Missouri East and	)	
West Service Territories	)	

**RESPONSE TO STAFF RECOMMENDATION**

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

1. On January 17, 2025, Spire Missouri submitted an application to change its Infrastructure System Replacement Surcharge (“ISRS”) for its Spire Missouri East and West Service Territories, requesting its total ISRS revenue requirement be increased by \$19,016,250.

2. On January 21, 2025, the Missouri Public Service Commission (“Commission”) ordered Staff to evaluate Spire Missouri’s application and file its recommendation by April 17, 2025. The Commission also directed the Office of the Public Counsel and any other party to file an objection or request for a hearing by April 17, 2025.

3. Staff filed its recommendation on April 17, 2025, and, at the time of this filing, no party has filed an objection to Spire Missouri’s application or requested a hearing.

4. Staff recommends that the Company’s ISRS revenue requirements be increased by \$6,220,563 for Spire Missouri East and \$12,795,687 for Spire Missouri West, resulting in a total incremental increase of \$19,016,250.

5. Including the present case, the Company has filed five ISRS cases since its last rate case, reflecting the significant efforts the Company is making to upgrade its aging infrastructure for the benefit of our customers and the public.

6. In File No. GO-2023-0203, Staff recommended, and Spire Missouri accepted, an ISRS revenue requirement of \$3,296,620 for Spire Missouri East and \$4,423,732 for Spire Missouri West, for a total incremental increase of \$7,720,352.

7. In File No. GO-2023-0432, Staff recommended, and Spire Missouri accepted, an ISRS revenue requirement of \$3,448,192 for Spire Missouri East and \$8,944,014 for Spire Missouri West, for a total incremental increase of \$12,392,206.

8. In File No. GO-2024-0214, Staff recommended, and the Company accepted, an ISRS revenue requirement of \$6,097,529 for Spire Missouri East and \$10,680,422 for Spire Missouri West, for a total incremental increase of \$16,777,951.

9. In File No. GR-2025-0026, Staff recommended, and the Company accepted, an ISRS revenue requirement of \$5,672,271 for Spire Missouri East and \$11,079,394 for Spire Missouri West, for a total incremental increase of \$16,751,665.

10. The cumulative ISRS revenue requirement recommended by Staff is \$24,735,175 for Spire Missouri East and \$47,923,248 for Spire Missouri West, for a total annual revenue increase of \$72,658,424.

11. In File No. GR-2022-0179, by stipulation and agreement, the Company's ISRS revenue requirement cap was set at \$72,658,424. Staff's recommendation brings the Company's cumulative ISRS revenue requirement to this cap.

12. After reviewing Staff's recommendation, the Company accepts Staff's proposed incremental revenue requirement of \$19,016,250 for Spire Missouri East and Spire Missouri West with an effective date no sooner than May 8, 2025. The Company appreciates Staff's diligence in this case.

13. Spire Missouri respectfully requests the Commission's expedience in taking this matter into consideration, so that the Company may receive timely recovery of its investments into maintaining its safe and reliable system for the benefit of its customers and the public. The Company requests an effective date no later than May 14, 2025.

**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 21st day of April, 2025.

*/s/ J. Antonio Arias*

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J. Antonio Arias