Exhibit No.:Issue(s):Weather NormalizationWitness:Melissa J. ReynoldsSponsoring Party:MoPSC StaffType of Exhibit:Direct TestimonyCase No.:GR-2025-0107Date Testimony Prepared:April 23, 2025

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER, SEWER, GAS, AND STEAM DEPARTMENT

DIRECT TESTIMONY

OF

MELISSA J. REYNOLDS

SPIRE MISSOURI INC., d/b/a Spire

CASE NO. GR-2025-0107

Jefferson City, Missouri April 2025

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1		DIRECT TESTIMONY					
2		OF					
3		MELISSA J. REYNOLDS					
4 5		SPIRE MISSOURI INC., d/b/a Spire					
6		CASE NO. GR-2025-0107					
7	Q.	Please state your name and business address.					
8	А.	My name is Melissa J. Reynolds, and my business address is 200 Madison Street,					
9	Jefferson Cit	y, Missouri 65102.					
10	Q.	By whom are you employed and in what capacity?					
11	А.	I am employed by the Missouri Public Service Commission ("Commission") as					
12	a Senior Res	earch/Data Analyst in the Water, Sewer, Gas, and Steam Department; Industry					
13	Analysis Div	ision. My credentials and a listing cases in which I have filed testimony previously					
14	before the Co	ommission are attached to this direct testimony as Schedule MJR-d1.					
15	EXECUTIV	<u>E SUMMARY</u>					
16	Q.	What is the purpose of your direct testimony?					
17	А.	The purpose of my direct testimony is to present how Staff determined the					
18	amount of Spire Missouri Inc.'s ("Spire Missouri", "Spire East", or "Spire West") adjusted						
19	Non-gas Operating Revenues. Test year revenues need to be appropriately normalized and						
20	annualized in	order to accurately measure the amount of any deficiency or excess in the current					
21	level of oper	ating revenues. Once determined, the deficiency or excess can only be made up,					
22	or otherwise	addressed, by adjusting retail rates (<i>i.e.</i> , rate revenue) prospectively.					

Q.

1

NON-GAS OPERATING REVENUES

2

What are Non-gas Operating Rate Revenues?

3 A. Non-gas Operating Rate Revenues are the revenues derived from Spire East and 4 Spire West's authorized Commission approved rates for providing natural gas service to their 5 retail customers, comprised of a variable charge and a customer charge. Spire East and Spire 6 West's variable charges are determined by the amount of each customer's usage and the 7 (per unit) rates that are applied to that usage. Each customer also pays a flat monthly customer 8 charge dependent upon each customer's rate class. The Spire East rate classes include 9 residential ("RGS"), small general ("SGS"), large general ("LGS"), large volume ("LV"), 10 unmetered gaslight ("UG"), liquid propane ("LP"), and large general transportation ("LG TS") 11 customer classifications. The Spire West rate classes include residential ("RGS"), small general 12 ("SGS"), large general ("LGS"), large volume ("LV"), unmetered gaslight ("UG"), large 13 general transportation ("LG TS") and large volume transportation ("LV TS") customer 14 classifications. Tables 1 and 2 below are Spire East and Spire West's ending rate revenue by 15 class.

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Total Normalized Revenue for Spire East and Spire West

EAST		
Rate Class	<u>Total</u>	MO Normalized Revenue
Residential Service	\$	295,891,074
Small General Service	\$	36,443,306
Large General Service	\$	26,513,766
Large Volume Service	\$	817,884
Unmetered Gaslight	\$	47,616
General LP	\$	11,612
Large General Transportation	\$	13,868,908
Total	\$	373,594,166

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WEST		
Rate Class	<u>Total</u>	MO Normalized Revenue
Residential Service	\$	251,387,602
Small General Service	\$	27,732,526
Large General Service	\$	16,930,115
Large Volume Service	\$	735,836
Unmetered Gaslight	\$	772
Large General Transport	\$	2,229,084
Large Volume Transportation	\$	16,402,043
Total	\$	315,417,978

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Q. Please briefly describe the normalized rate revenue development in this case.

4 Staff began by determining the level of revenue that Spire East and Spire West A. 5 would collect on an annual basis under normal weather conditions, natural gas usage, and 6 number of customers. Staff's analyses are based on information that is "known and 7 measurable" such as billing determinants and the rates as stated in the tariff, which were 8 established in Spire Missouri's most recent rate case, Case No. GR-2022-0179. Revenue was 9 calculated by rate class with adjustment considerations such as weather normalization, customer 10 annualization, and rate switcher analyses.

11

Q.

What are billing determinants?

A. Billing determinants are used to create rate charges by applying a mathematical operator to interval data within a time-of-use period. Generally, billing determinants include such information as the number of customers and usage. Spire East and Spire West variable charges are determined by the amount of each customer's usage and the (per unit) rates that are applied to that usage. Each customer also pays a flat monthly customer charge dependent upon each customer's rate class. Some classes may also have additional set fees such as an Electronic Gas Meter ("EGM") charge for the equipment monitoring use or a Demand charge based on

the maximum amount of usage that a customer uses in any interval, typically 15 minutes, during 1 2 the billing cycle. 3 Are new billing determinants being established in this rate case? Q. A. Yes. New billing determinants are established for each rate class based on 4 5 normalized revenue (Schedule MJR-d2). Billing determinants must be determined in every rate 6 case. 7 Q. How and in what form were customer data, including energy use, provided 8 by Spire? 9 Staff requested data such as customer usage and number of customers via Data A. Requests ("DR").¹ These datasets were provided to Staff as monthly summaries of customer 10 11 use and bill count including summaries of billing cycles separately for Spire East and Spire 12 West. In addition to the typical 18 billing cycles, non-billing and weekend billing cycle 13 summaries were also present each month. Staff requested individual customer data by 14 month/billing cycle and separated by class, and Staff was directed to the monthly summary 15 sheets supplied that only contain composite billing numbers and usage separated by 16 Residential, Commercial, and Industrial customer totals. In a meeting with Spire Missouri on February 19, 2025, Staff asked if the "raw data" that is consolidated to the summary sheets 17 18 could be provided separated by rate class. Staff was told that Spire does not pull data in that 19 way, so it would take a new query to be set up and a lot of time to manage such an ask. 20 Why is the dataset format important? Q. 21 A. Staff must rely on the accuracy of the monthly summary sheets for customer

¹ Staff DR 0109, DR 0169, and DR 0168.

22

numbers and usage and does not include all billed charges that would show up on a customer's

bill such as EGM charges. Therefore, normalized revenue calculations are only as accurate as
 the summarized data provided by Spire Missouri.

3 Q. Was information shared suggesting data supplied may be inaccurate for revenue4 and adjustments?

A. Yes. During meetings with Spire Missouri on April 1 and April 3, 2025,
Spire Missouri brought to Staff's attention that customer counts for the test year are "artificially
inflated" due to back billing for up to 12 months of usage in a single month to customers during
the test year starting around March 2024.

9 Q. Why was Spire Missouri back billing customers for up to 12 months of usage in
10 a single month?

11 A. Spire Missouri stated they began looking at meters that were not physically 12 disconnected when a customer closed their account due to moving and gas service continued 13 with a new resident without an account attached to the gas usage. The new accounts that were 14 then connected to these meters to keep service were back-billed, meaning billed for gas usage 15 in prior months during which the same resident occupied the residence but did not have a Spire 16 Missouri account, for gas usage for up to one year. This meant that a significant amount of gas 17 usage is inaccurately distributed among months, and some back-billed gas usage may not have 18 occurred during the test year. Customer bill numbers and potentially customer charges may 19 also be inflated during months of back-billing.

- 20 Q. Has Spire Missouri provided account data for the customers involved in this21 back-billing?
- 22

23

A.

No. Spire is gathering this data to provide to Staff.

Q. Could this impact Revenue and Adjustment calculations?

Q.

A. Potentially, yes. Staff will not know until customer data related to back billing
 has been received and analyzed. For now, Staff has calculated revenues with the data provided
 to Staff from Spire Missouri. Staff will re-evaluate for the update period ending May 31, 2025.

4

WEATHER NORMALIZATION ADJUSTMENT

- 5
- How is weather related to gas usage?

A. Although natural gas can be used by multiple home appliances, such as ovens,
clothes dryers, and water heaters, the primary use for natural gas in Missouri is space heating.
Space heating use is heavily dependent on weather conditions. Abnormal weather conditions,
such as winter storms or periods of warmer-than-usual temperatures, have predictable and
sometimes profound impacts on natural gas usage. Therefore, test year gas usage and revenue
need to be adjusted to "normal" weather so that rates will be designed on the basis of normal
weather rather than any anomalous weather that occurred during the test year.

Q. What weather data is needed to calculate this adjustment?

A. Weather data consists of actual and normal weather, including heating degree
days ("HDD")² that coincide with Spire Missouri's test year and update period. Staff's weather
normalization adjustment relied on actual and 30-year normal weather data provided by witness
Michael L. Stahlman.

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Q. Are different weather data sets provided for different regions of Missouri?

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A.

The unified weater and sets provided for unified regions of thisseart.

Yes. Weather data from St. Louis Lambert International Airport ("STL") and

20

Kansas City International Airport ("MCI") were analyzed by Staff. These different regional

 $^{^{2}}$ HDDs are based on the difference of the mean daily temperature ("MDT") from a comfort level of 65°F. HDDs are calculated as the difference between 65°F and the MDT when the MDT is below 65°F and equal to zero when the MDT is above 65°F.

weather data sets were utilized due to their approximate location to Spire Missouri's gas
 customer base. Weather data from STL was used for the service territories of Spire East, and
 MCI was used for the service territories of Spire West.

4

Q. What is weather normalization?

5 Weather normalization is the process of adjusting energy consumption to A. 6 account for the impact of weather during the test year. This process reduces the influence of 7 abnormal weather from the test year in order to provide a more accurate representation of 8 "normal" energy usage, by evaluating weather over a period of many years. Since the primary 9 use of natural gas is for space heating, the level of natural gas sales is dependent upon weather 10 conditions. It is important to remove the influence of abnormal weather from the test year in 11 order to provide a more accurate representation of "normal" natural gas usage. For example, if 12 anticipated natural gas sales are overstated because the weather in the test period was colder 13 than normal, then Spire Missouri may under-recover its revenue requirement. On the flip side, 14 if anticipated natural gas sales are understated because the weather in the test period was warmer 15 than normal, then Spire Missouri may over-recover its revenue requirement.

16

Q. How did Staff calculate weather normalized sales?

A. Staff's weather normalized adjustments of natural gas sales account for
deviations from what are considered normal weather conditions that occurred during the test
year. Normal weather conditions are at or near the average climatological value over a certain
period. Staff adjusted monthly natural gas volumes to normal by first consolidating non-billing
and weekend billing cycle data with the standard billing cycle³ data so that all energy use and

³ Customers are divided up over 18 separate billing cycles within a billing month. For example, a percentage of the Company's customers are billed on the 1st of the month, which is the 1st billing cycle, and another percentage of customers are billed on another day of the month. Billing cycles are used to spread out the number of meters read and bills issued on any specific day of the month.

2 days for each billing cycle to 365, which adjusts for the Leap Day within this test year. Staff 3 then calculated the average use per customer per day for each of the twelve months ending 4 December 2024 based on the number of customers, usage, and HDDs per billing cycle per 5 month for Spire Missouri's RGS, SGS, and LGS rate classes; those classes traditionally impacted by weather. Staff did not perform a weather normalization calculation for LV and 6 7 Transportation classes because energy use in these classes is not generally impacted by weather 8 due to being a small number of Industrial and Commercial customers with large usage. After 9 these adjustments, the difference between normal and actual HDDs were calculated for each 10 billing cycle, and those differences were multiplied by the estimate rendered from a regression 11 analysis to determine the change in usage for each billing cycle due to abnormal weather.

12

Q.

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Please describe the regression analysis.

13 A. The regression equation develops quantitative measures that describe the 14 relationship between daily usage per customer in gas per hundred cubic feet ("ccf") to the daily 15 HDDs. The regression equation estimates a change in the daily natural gas usage per customer 16 whenever the daily average weather changes by an HDD. These values can then be used to 17 adjust each class's monthly usage for normal weather conditions.

18 Q. Please describe the Weather Normalization Adjustment values for the three 19 customer classes- RGS, SGS, and LGS of Spire East.

20 Staff conducted analyses of weather normalization for RGS, SGS, and LGS for A. 21 the test year as updated through December 31, 2024, (Table 3). Staff's overall weather 22 normalization analyses determined that the weather during the test year was warmer than 23 normal. Therefore, actual sales were lower than normal. In order to account for the reduced

sales and warmer weather, Staff made an adjustment to increase natural gas sales to reflect sales 1 2 for "normal" weather conditions. Staff's analyses resulted in an approximate increase of 5.87% 3 for the RGS class, an approximate increase of 4.44% for the SGS class, and an increase of 4 approximately 3.32% for the LGS class. These adjustments account for changes in sales to 5 reflect normal weather and the annual number of days in a billing cycle.

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Table 3, Spire East rate classes: Actual usage and weather adjustment

Spire East	R	GS	S	GS	L	GS
Billing Month	Actual Usage (Ccf)	Weather Adj. (Ccf)	Actual Usage (Ccf)	Weather Adj. (Ccf)	Actual Usage (Ccf)	Weather Adj. (Ccf)
January	82,199,233	210,169	14,593,149	(769,811)	18,920,552	(1,072,828)
February	80,397,491	113,814	15,822,226	(198,869)	21,520,342	(563,691)
March	44,677,823	10,622,135	9,180,012	2,026,007	19,139,315	3,077,538
April	32,743,197	1,902,277	5,866,578	360,161	10,921,148	519,784
May	15,103,188	1,502,366	2,832,571	266,617	7,288,465	321,217
June	9,813,192	1,735,573	1,980,691	323,775	4,682,461	397,259
July	8,030,983	84,314	1,524,217	17,460	4,143,622	25,785
August	8,120,396	(232,786)	1,720,995	(38,173)	4,287,580	(54,515)
September	8,379,624	620,087	1,665,967	99,508	4,366,693	100,065
October	10,410,249	2,202,091	1,883,252	375,002	5,069,768	401,183
November	20,913,358	3,313,170	3,307,960	589,258	6,998,650	761,714
December	61,786,751	393,525	10,359,201	87,910	14,864,448	143,423
Total	382,575,485	22,466,736	70,736,819	3,138,846	122,203,044	4,056,932
Percent Change		5.87%		4.44%		3.32%

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Q. Please describe the Weather Normalization Adjustment values for the three customer classes- RGS, SGS, and LGS of Spire West.

A. Staff conducted analyses of weather normalization for RGS, SGS, and LGS for the test year as updated through December 31, 2024 (Table 4). Staff's weather normalization analyses of Spire West gas sales resulted in an increase in natural gas sales because the weather during the test year was warmer than normal. Analyses resulted in an approximate increase of 15.87% for the RGS class, an approximate increase of 15.68% for the SGS class, and an increase of approximately 12.35% for the LGS class (Table 4). These adjustments account for changes in sales due to abnormal weather and the annual number of days in the billing cycle.

, I			0		5		
Spire West	R	GS	S	GS	LGS		
Billing Month	Actual Usage (Ccf)	Weather Adj. (Ccf)	Actual Usage (Ccf)	Weather Adj. (Ccf)	Actual Usage (Ccf)	Weather Adj. (Ccf)	
January	68,806,165	(89,579)	12,686,811	(66,914)	10,082,985	(297,048)	
February	63,242,219	5,482,477	12,390,503	916,395	10,863,139	841,997	
March	34,772,233	12,310,082	6,240,113	2,340,393	9,295,073	2,142,544	
April	25,496,583	7,043,353	4,505,238	1,301,976	5,219,633	1,080,786	
May	11,016,453	4,902,553	2,016,341	892,895	2,872,467	760,741	
June	6,984,739	1,319,642	1,400,572	263,851	1,941,917	214,327	
July	5,835,566	117,736	1,204,373	25,337	1,738,037	21,250	
August	5,929,891	(165,684)	1,214,809	(28,548)	1,659,773	(35,628)	
September	5,846,719	898,209	1,169,055	159,319	1,869,719	141,498	
October	7,174,431	4,633,481	1,338,888	824,291	2,085,376	694,084	
November	15,329,963	6,454,437	2,516,695	1,179,636	3,708,867	995,380	
December	48,352,722	4,512,304	8,514,543	844,753	7,327,720	682,624	
Total	298,787,684	47,419,012	55,197,940	8,653,383	58,664,706	7,242,554	
Percent Change		15.87%		15.68%		12.35%	

Table 4, Spire West rate classes: Actual usage and weather adjustment

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Q. How does Staff calculate annualized customer numbers?

ANNUALIZED CUSTOMER ADJUSTMENT

5 Customer growth or loss is analyzed to determine if revenue adjustments are A. 6 necessary to reflect the ongoing level of revenue based on customer count analyses after 7 weather normalization, if weather normalization is conducted. Natural gas customers tend to 8 fluctuate seasonally over a 12-month period, with some customers leaving the system during 9 the spring and summer months and then rejoining the system during the fall and winter months. 10 Staff has analyzed customer numbers and usage for all rate classes for Spire East and Spire 11 West to determine seasonality and annualization. In order to annualize gas revenues for 12 customer growth or loss, Staff utilizes at least three consecutive years of customer counts. 13 Three methods utilized for this adjustment include: 1) end of period customer levels due to 14 constant customer growth, 2) end of period customer levels factored for the effects of 15 seasonality, and 3) test year or update levels of customers. Customer counts are first graphed 16 for each month for multiple 12-month periods to determine change from month to month and 17 year to year. Consistent change or curves for summer versus winter months each year suggests

seasonality. For example, the RGS class customer counts for both Spire East and Spire West
 (see Graph 1 below for Spire West) have historically portrayed over the past four years a
 consistent seasonality curve. However, for the 12-months ending December 2024, RGS
 customer counts for both Spire East and Spire West did not have a profound seasonality curve.

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Graph 1, Spire West RGS Customer Counts: Comparing 12-month Periods



Q. What do you think has caused a lack of seasonality in the RGS class in 2024?

A. The "artificial inflation" of back billing referenced above or a substantial decline

of typical disconnects and reconnects are the most likely cause of this lack of seasonality.

Q. Can this impact the Customer Annualization Adjustment?

A. Yes. The Customer Annualization Adjustment may need to be re-evaluated for
the True-up period through May 31, 2025, once updated data is provided by Spire Missouri.

13 **RATE SWITCHERS**

14

Q. What are rate switchers?

1 A. Rate switching is when customers switch which rate schedule they will be served 2 or are moved from one rate class to another during the test year or update period. Customers 3 continually switch rate classes. There are many reasons for this change, but it is based on 4 customer usage being reviewed each year by Spire Missouri placing them in a different class 5 or the customer has examined current operations and performed the necessary reviews to 6 determine that a rate switch at this time would save them money on their utility bills. 7 The reasons that might trigger this switch could range from a change in operations of a customer 8 by just becoming more knowledgeable about their energy consumptions and the savings that 9 can be achieved by switching to physical operation changes as customer needs change. 10 Rate switching also often occurs after rate increases. Customers switching classes must be 11 analyzed in order to determine if it is warranted to ensure an accurate portrayal of revenues under existing rates. 12

13

Q.

How does Staff account for rate switchers?

A. If a customer was in a rate class at the beginning of the test year, then transferred to a different rate class during the test year, the customer's billing determinants and associated revenues in the original class were removed from that class' total and then added to the new rate class. The customer's billing determinants were then "priced out" using the tariffs of the class to which the customer switched, and those determinants and revenues were added to the totals in the new class.

20

Q. Did Staff make any rate switcher adjustments?

A. Yes. According to customer information provided in DR 0169, several
customers switched between SGS and LGS and between LGS and Transportation classes for

Spire East, and several customers switched between SGS and LGS, LGS and LV, LGS and
 Transportation classes, and LV and Transportation classes for Spire West during the test year.
 Q. Were there issues with the rate switching customer data provided by
 Spire Missouri?

A. Yes. Customer data for rate switchers during the test year were provided separately for Spire East and Spire West. Discussions made with Spire Missouri in a meeting on April 1, 2025, and a follow-up email received after the meeting determined that the files were not accurately separating Spire East and Spire West customers and had other potential errors. Spire Missouri agreed to run another query to provide more accurate rate switcher customer data.

11

Was new rate switcher customer data provided prior to testimony?

A. No. New rate switcher data was not provided prior to this testimony. Therefore,
rate switcher adjustments have been completed with original data provided, but will need to be
re-evaluated for the True-up period ending May 31, 2025.

15 CONCLUSION

Q.

Q.

16

Can you summarize Staff's position regarding revenues?

A. Given the data available at this time, it is Staff's position that the correct
normalized revenues with the adjustments shown in Tables 5 and 6 are \$373,594,166 for
Spire East, and \$315,417,979 for Spire West, as shown in the attached schedule (Schedule
MJR-d3). Staff also recommends that the Commission order the use of Staff's billing
determinants for each rate class based on normalized revenues, also shown in the attached
schedules to establish rates.

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Table 5, Spire East Adjustments

EAST					
Rate Class	Ra	te Switching	We	eather, Days & Rate Adj.	Customer Annualization
Residential Service			\$	8,033,253	\$ 264,008
Small General Service	\$	610,511	\$	753,982	\$ 71,290
Large General Service	\$	(908,497)	\$	636,492	\$ (235,115)
Large Volume Service					\$ -
Unmetered Gaslight					
General LP					
Large General Transportation	\$	12,454			\$ -
Total	\$	(285,532)	\$	9,423,727	\$ 100,183

2 3

Table 6, Spire West Adjustments

WEST						
Rate Class	<u>s</u>	Rate_ witching_	w	eather, Days & Rate <u>Adj.</u>	<u>(</u> <u>Ani</u>	<u>Customer</u> nualization
Residential Service			\$	17,309,809	\$	2,446,373
Small General Service	\$	(64,485)	\$	1,610,906	\$	(132,117)
Large General Service	\$	(759,356)	\$	1,145,989	\$	7,710
Large Volume Service	\$	(326,586)				
Unmetered Gaslight						
Large General Transport	\$	153,056				
Large Volume Transportation	\$	344,872				
Total	\$	(652,499)	\$	20,066,704	\$	2,321,966

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Will Staff adjust these calculations when more accurate data is made available

6 by Spire Missouri?

Q.

A. Staff may make adjustments depending on the quality of the data presented.

Q. Does this conclude your direct testimony?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

)

)

In the Matter of Spire Missouri Inc. d/b/a Spire's Request for Authority to Implement a General) Rate Increase for Natural Gas Service Provided) in the Company's Missouri Service Areas

Case No. GR-2025-0107

AFFIDAVIT OF MELISSA J. REYNOLDS

STATE OF MISSOURI)	
)	SS.
COUNTY OF COLE)	

COMES NOW MELISSA J. REYNOLDS and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing Direct Testimony of Melissa J. Reynolds; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

MELISSA J. REYNOLDS

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this _____ 18th day of April 2025.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2029 Commission Number: 12412070

sellankin

Notary Public (

<u>Melissa J. Reynolds</u>

I serve as a Senior Research/Data Analyst for the Water, Sewer, Gas, & Steam Department, in the Industry Analysis Division of the Missouri Public Service Commission. I have been employed by the State of Missouri since 2011, and have been with the Commission since October 1, 2024. My duties as Senior Utility Regulatory Specialist involve multiple aspects of the Commission's regulation of water, sewer, gas, and steam industries including case management, customer complaints, drafting and reviewing testimony, and working with the utilities to promote best practices in their provision of safe and adequate service at just and reasonable rates.

Educational Background and Work Experience

I have Master of Science degree in Biology from Missouri State University in Springfield, Missouri. Prior to joining the Public Service Commission, I was employed by the Missouri Department of Health and Senior Services (DHSS) – Bureau of Environmental Epidemiology (BEE) from 2015 to 2024 as an Environmental Specialist, Senior Epidemiologist, and Program Manager over the Wastewater Surveillance Program, as well as being a member of the Radiological Emergency Response team. I started my state employment at the State Public Health Laboratory (SPHL) in 2011 as a Scientist where I continue to work part-time in the Newborn Screening Unit. I also teach Human Anatomy and Physiology courses at State Fair Community College in Sedalia, MO. I have competence in environmental testing of drinking water, environmental inspections, and installation of on-site wastewater systems. I also have vast experience with grant writing and management.

Previous Testimony Before the Public Service Commission

Case Number	Company	Type of Testimony	Issue
GR-2024-0369	Ameren Missouri	Rebuttal	Weather Normalization, Revenue

Recommendation/Memorandum

Case Number	Company	Issue
HT-2024-0296	Evergy Missouri West	Quarterly Cost Adjustment (QCA) 4 th quarter

SPIRE EAST Residential (RGS)

Final Billing Determinants	Determinants	Rates	Revenue
Customer charge	7,492,161	\$ 20.00	\$ 149,843,223
Summer Ccf			
First 50	62,578,186	0.32877	\$ 20,573,830
Over 50	5,338,650	0.39835	5 \$ 2,126,651
Winter Ccf			
First 50	337,580,891	0.36538	\$ \$ 123,345,306
Over 50	5,648	0.36538	3 \$ 2,064
Total	405,503,375		\$ 295,891,074

Small General Service (SGS)

Final Billing Determinants	Determinants	Rate	es	Rev	venue
Customer charge	443,513	\$	40.72	\$	18,059,866
Ccf	73,989,132		0.24021	\$	17,772,929
Total				\$	35,832,795

Large General Service (LGS)

Final Billing Determinants	Determinants	Rate	es	Rev	/enue
Customer charge	53,967	\$	145.43	\$	7,848,450
Ccf	124,761,380		0.15689	\$	19,573,813
Total				\$	27,422,263

Large Volume (LV)				
Final Billing Determinants	Determinants	Rates	Rev	venue
Customer charge	343	\$ 1,063.73	\$	364,859.39
Demand	299,928	\$ 1.12	\$	335,919.02
Block 1 Ccf	3,846,021	0.03008	\$\$	115,688.31
Block 2 Ccf	160,705	0.00882	<u>)</u>	1417.4181
Total			\$	817,884

Liquid Propane (LP)

Final Billing Determinants	Determinants	Rates	Revenue	
Customer charge	399.5	\$ 20.87	\$ 8,33	7.57
Gallons	12592.26	0.26	\$ 3,27	3.99
Total			\$ 11	,612

Unmetered Gas (UG)

Final Billing Determinants	Determinants	Rates		Revenu	e
Customer Charge	782.73	\$	6.99	\$	5,471
each additional	7,048	\$	5.98	\$	42,145
Total				\$	47,616

Transporation (LG TS)

Final Billing Determinants	Determinants	Rates	Re	venue
Customer Charge	1,737	\$ 2,211.60	\$	3,841,549
Special Contract Customer Cha	12	\$ 750.00	\$	9,000
Block 1	54,461,257	0.02559	\$	1,393,664
Block 2	124,415,798	0.01071	\$	1,332,493
Demand	11,818,099	0.612	\$	7,232,676
Charled Contract through Eab	276 270	0 0020	ç	1 070
Special Contract through Feb 4	276,370	0.0039	Ş	1,078
Special Contract starting Mar 2	1,004,840	0.0032	\$	3,215
Special Contract Demand	69,900	0.612	\$	42,779
Total			\$	13,856,454

SPIRE WEST Residential (RGS)

Final Billing Determinants	Determinants	Rates	Revenue
Customer charge	6,114,739	\$ 20.00	\$ 122,294,779
Summer Ccf			
First 50	50,388,177	0.3366	5 \$ 16,960,660
Over 50	2,382,046	0.41527	′\$ 989,192
Winter Ccf			
First 50	297,141,937	0.37404	\$ 111,142,970
Over 50	-	0.37404	ŀ
Total			\$ 251,387,602

Small General Service (SGS)

Final Billing Determinants	Determinants	Rates	Rev	venue
Customer charge	367,840	\$ 43.70	\$	16,074,629
Block 1 First 5,000 Ccf	62,522,309	0.18592	\$	11,624,148
Block 2 Over 5,000 Ccf	422,676	0.23241	\$	98,234
Total			\$	27,797,011

Large General Service (LGS)

Final Billing Determinants	Determinants	Rates		Rev	venue
Customer charge	38,254	\$	189.61	\$	7,253,256
Ccf	65,955,984		0.15823	\$	10,436,215
Total				\$	17,689,471

Large Volume (LV)

Final Billing Determinants	Determinants	Rates	Rev	venue
Customer charge	381	\$ 1,595.40	\$	608,326
Fixed monthly meter charge if	36	\$ 293.38	\$	10,562
Summer				
Block 1 First 36,000 Ccf	1,229,130	0.05129	\$	63,042
Block 2 Over 36,000 Ccf	1,550,092	0.03399	\$	52,688
Winter				
Block 1 First 36,000 Ccf	1,941,630	0.08217	\$	159,544
Block 2 Over 36,000 Ccf	2,624,987	0.0641	\$	168,262
Total			\$	1,062,423

Unmetered Gas (UG)					
Final Billing Determinants	Determinants	Rates		Revenue	
Customer Charge per Light unit	24 5	\$	6.43	\$	154
Total				\$	772

Transporation (LG TS)

Final Billing Determinants	Determinants	Rates		Rev	venue
Customer charge	2,751	\$	195.39	\$	537,518
EGM	2,825	\$	25.00	\$	70,625
Nov-March ccf	8,357,479		\$0.13268	\$	1,108,870
Apr-Oct ccf	4,695,460		\$0.07646	\$	359,015
Total				\$	2,076,028

Large Volume Transporation (LV TS)

Final Billing Determinants	De	eterminants	Ra	tes	Revenue				
Customer Charge		4,807	\$	1,238.36	\$	5,952,797			
Fixed monthly meter charge if		992	\$	393.38	\$	390,233			
EGM Charge		5,381	\$	25.00	\$	134,531			
Winter (Nov-March) ccf Block	\$	38,208,940	\$	0.05512	\$	2,106,077			
Winter Block 2	\$	85,496,750	\$	0.04300	\$	3,676,360			
Summer (Apr-Oct) ccf Block 1	\$	40,575,210	\$	0.03441	\$	1,396,193			
Summer Block 2	\$	102,632,790	\$	0.02280	\$	2,340,028			
Special Contract Ccf	\$	7,619,110	\$	0.00800	\$	60,953			
Total					\$	16,057,171			

WEST

						12 Month													
		Revenue		12 Month	Ending Dec									Total MO					
	0	ordered GR-		Ending Sep.	2	2024 Revenue		2024 Revenue			Weather, Days			<u>Customer</u>	Normalized				
Rate Class		<u>2022-0179</u>	2	024 Revenue		<u>Adj</u>	Ra	te Switching	8	<u>& Rate Adj.</u>	Ar	<u>nnualization</u>		<u>Revenue</u>	<u>Su</u>	<u>mmer usage</u>	<u>Winter usage</u>		
Residential Service	\$	258,173,012	\$	233,750,582	\$	(2,119,162)			\$	17,309,809	\$	2,446,373	\$	251,387,602	\$	17,949,853	\$ 111,142,970		
Small General Service	\$	27,566,558	\$	26,346,655	\$	(28,433)	\$	(64 <i>,</i> 485)	\$	1,610,906	\$	(132,117)	\$	27,732,526					
Large General Service	\$	19,144,211	\$	16,752,972	\$	(217,199)	\$	(759 <i>,</i> 356)	\$	1,145,989	\$	7,710	\$	16,930,115					
Large Volume Service	\$	1,320,522	\$	1,053,975	\$	8,447	\$	(326,586)					\$	735,836	\$	-	\$-		
Unmetered Gaslight	\$	1,852	\$	772									\$	772					
Large General Transport	\$	2,072,736	\$	2,028,745	\$	47,284	\$	153,056					\$	2,229,084					
Large Volume Transportation	\$	16,054,710	\$	16,032,628	\$	24,544	\$	344,872					\$	16,402,043	_				
Total	\$	324,333,601	\$	295,966,327	\$	(24,150,394)	\$	(652,499)	\$	41,932,579	\$	2,321,966	\$	315,417,979	-				

									<u>Customer</u>				
						W	eather, Days		<u>Variance</u>	Sp	ire MOW G-1		
Spire Missouri Calculations	Rate Class		Test Year	Rat	te Switching	8	<u>& Rate Adj.</u>	A	<u>djustment</u>		Rev		
	Residential Service	\$	210,948,501			\$	26,904,763	\$	(4,281,254)	\$	233,572,010		-7.63%
	Small General Service	\$	23,126,936	\$	(136,952)	\$	3,192,620			\$	26,319,556		-5.37%
	Large General Service	\$	14,248,539	\$	(413,934)	\$	2,515,890			\$	16,764,429		-0.99%
	Large Volume Service	\$	1,076,550							\$	1,076,550	LV, SL, LP, VF	31.58%
	Unmetered Gaslight												
	Large General Transport	\$	17,779,131							\$	17,779,131	Transporation	-4.79%
	Large Volume Transportation												
		4		Ŧ	(+		+		1			

\$ 267,179,657 \$ (550,885) \$ 32,613,273 \$ (4,281,254) \$ 295,511,676

											<u>Total MO</u>	
	<u>12</u>	Month Ending Sep	12 Month Ending Dec				W	eather, Days &	Customer		Normalized	
Rate Class		2024 Revenue		2024 Revenue Adj	Rate Switching			Rate Adj.	Annualization		Revenue	
Residential Service	\$	287,969,771	\$	(375,958)			\$	8,033,253	\$	264,008	\$ 295,891,074	
Small General Service	\$	34,688,373	\$	319,151	\$	610,511	\$	753,982	\$	71,290	\$ 36,443,306	
Large General Service	\$	26,631,547	\$	389,339	\$	(908,497)	\$	636,492	\$	(235,115)	\$ 26,513,766	
Large Volume Service	\$	801,355	\$	16,529					\$	-	\$ 817,884	
Unmetered Gaslight	\$	47,870	\$	(254)							\$ 47,616	
General LP	\$	11,591	\$	20							\$ 11,612	
Large General Transportation	\$	12,038,454	\$	1,818,001	\$	12,454			\$	-	\$ 13,868,908	
Total	\$	362,188,960	\$	2,166,827	\$	(285,532)	\$	9,423,727	\$	100,183	\$ 373,594,166	

								Customer_					
					We	eather, Days &		Variance	Sp	pire MOE G-1			
Spire Missouri Calculations	Rate Class	Test Year	Rat	e Switching		Rate Adj.	<u>A</u>	djustment		<u>Rev</u>			
	Residential Service	\$ 265,323,691			\$	26,904,763	\$	(4,281,254)	\$	287,947,200		-	-2.76%
	Small General Service	\$ 31,633,977	\$	(136,952)	\$	3,192,620			\$	34,689,645		-	-5.06%
	Large General Service	\$ 24,563,134	\$	(413,934)	\$	2,515,890			\$	26,665,090			0.57%
	Large Volume Service Unmetered Gaslight General LP	\$ 861,492							\$	861,492 LV	, SL, LP, VF	-	-1.81%
	Large General Transport	\$ 13,814,997							\$	13,814,997		-	-0.39%
	Total	\$ 336,197,290	\$	(550,885)	\$	32,613,273	\$	(4,281,254)	\$	363,978,423			