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| <b>Exhibit No.:</b>      |  |
| <b>Issue(s):</b>         | <b>One Spire Missouri<br/>Compliance<br/>Disconnection Practices<br/>Transportation Tariffs<br/>Miscellaneous Charges<br/>Special Contract Rates</b> |
| <b>Witness:</b>          | <b>Julie Johnson</b>   |
| <b>Type of Exhibit:</b>  | <b>Rebuttal Testimony</b>  |
| <b>Sponsoring Party:</b> | <b>Spire Missouri Inc.</b>   |
| <b>Case Nos.</b>         | <b>GR-2025-0107</b>  |
| <b>Date Prepared:</b>    | <b>May 30, 2025</b>  |

**SPIRE MISSOURI INC.**

**GR-2025-0107**

**REBUTTAL TESTIMONY**

**OF**

**JULIE JOHNSON**

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### **EXHIBITS:**

**Exhibit JLJ-R1: Supplemental Response to Staff Data Request 0258**

**REBUTTAL TESTIMONY OF JULIE JOHNSON**

**I. INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Julie Johnson, and my business address is 700 Market Street, St. Louis, MO 63101.

**Q. ARE YOU THE SAME JULIE JOHNSON THAT SUBMITTED DIRECT TESTIMONY IN THIS CASE?**

A. Yes, I am.

**Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

A. The purpose of my rebuttal testimony is to address various issues and positions taken by Staff of the Missouri Public Service Commission (“Staff”) witnesses Michael J. Abbott and Sarah Fontaine relating to Spire Missouri Inc.’s (“Spire Missouri” or the “Company”) compliance with certain portions of the November 4, 2022 Full Unanimous Stipulation and Agreement (“2022 Stipulation and Agreement”) and disconnection practices. Additionally, the purpose of my rebuttal testimony is to address various issues and positions taken by Staff witnesses Anne M. Crowe and Kerri Roth and Consumers Council of Missouri’s (“CCM”) witnesses Bradley T. Cebulko and Jim Thomas in their Class Cost of Service Study (“COSS”) and rate design testimonies relating to Spire Missouri’s Transportation Service tariff, the residential system charge (referred to in my direct testimony as the “customer charge”), and other miscellaneous charges, late fees, and reconnection charges, and Spire Missouri’s special contract rates.

1 **II. ONE SPIRE MISSOURI**

2 **Q. DID STAFF PROPOSE CONSOLIDATION OF SPIRE MISSOURI'S RATE**  
3 **STRUCTURES TO UNIFY ITS OPERATING UNITS INTO ONE SPIRE**  
4 **MISSOURI?**

5 A. Staff did not propose a consolidated rate structure. Spire Missouri still proposes  
6 consolidating its rate structures consistent between both its operating units, Spire Missouri  
7 East and Spire Missouri West.

8 **Q. DO OTHER MISSOURI UTILITIES HAVE ONE RATE FOR CUSTOMERS**  
9 **ACROSS JURISDICTIONS?**

10 A. Yes. Ameren Missouri, which is a large utility similar to Spire Missouri, has a single rate  
11 structure for its customers spanning from south of Cape Girardeau to the Kansas City area.

12 **III. COMPLIANCE AND DISCONNECTION PRACTICES**

13 **Q. STAFF WITNESS ABBOTT DETERMINED SPIRE MISSOURI IS CONSIDERED**  
14 **IN COMPLIANCE WITH ITEMS 1-11, 25, 27, 28, AND 34 OF THE 2022**  
15 **STIPULATION AND AGREEMENT, AND THAT THESE ITEMS AS**  
16 **ESTABLISHED IN THE 2022 STIPULATION AND AGREEMENT FOR CASE**  
17 **NO. GR-2022-0179 ARE NOT REQUIRED TO BE CONTINUED. HOW DO YOU**  
18 **RESPOND TO MR. ABBOTT'S CONCLUSION REGARDING THE LISTED**  
19 **PROVISIONS OF THE 2022 STIPULATION AND AGREEMENT?**

20 A. The Company agrees with Staff witness Abbott's conclusion regarding the provisions of  
21 the 2022 Stipulation and Agreement listed above.

22 **Q. STAFF WITNESS FONTAINE RECOMMENDS THAT SPIRE MISSOURI**  
23 **SHOULD REVISE ITS TARIFF TO REFLECT ITS NEW POLICY THAT IT**

1       **WILL NOT DISCONNECT CUSTOMERS ON COLD WEATHER RULE DAYS**  
2       **EXCEPT IN CASES OF ATMOSPHERIC CORROSION INSPECTION (“ACI”)**  
3       **SAFETY INSPECTIONS AND LOCKED METERS SHOWING CONSUMPTION.**  
4       **DO YOU AGREE?**

5     A.   The Company agrees with Staff witness Fontaine’s recommendation to revise Spire  
6       Missouri’s tariff sheet R-22.2 to reflect its policy of applying the Cold Weather Rule to not  
7       disconnect customers from November 1 through March 31 when the National Weather  
8       Service has issued a local forecast between 6:00 a.m. and 9:00 a.m. predicting the  
9       temperature will drop below 32 degrees Fahrenheit during the following 24 hours with the  
10      exception of ACI safety inspections and locked meters showing consumption. Beginning  
11      August 28, 2025, the language around Cold Weather Rule will change to “from November  
12      1 through March 31 when the National Weather Service has issued a local forecast between  
13      6:00 a.m. and 9:00 a.m. predicting the temperature will drop below 32 degrees Fahrenheit  
14      during the following 72 hours.” This change will be reflected in the Company’s tariffs. The  
15      Company also addressed this issue in its response to the Missouri Public Service  
16      Commission order regarding customer allegations on disconnections and reconnections.

17   **Q.   STAFF WITNESS FONTAINE RECOMMENDS SPIRE MISSOURI REFINE ITS**  
18       **VACANT WITH CONSUMPTION METER PROCEDURES—SPECIFICALLY,**  
19       **HOW IT HANDLES NOTICES, DISCONNECTIONS, AND RECONNECTIONS**  
20       **RELATED TO VACANT METERS SHOWING CONSUMPTION. HOW DO YOU**  
21       **GENERALLY RESPOND TO THOSE RECOMMENDATIONS?**

22   A.   I agree with the recommendation to refine and improve Spire Missouri’s procedures for  
23       handling vacant meters showing consumption. The Company has previously reviewed its

1 internal process regarding vacant with consumption meters. Spire Missouri has  
2 implemented changes to the routing process and identified and communicated ownership  
3 responsibilities of the work for these field activities. Field activities related to delayed  
4 transfers are treated as priority orders by the workload planning team when routing to  
5 ensure they are worked in a timely manner. In the event that the Company falls behind on  
6 working these field activities in the future, additional communication will be provided to  
7 the impacted occupants and the Commission. Spire Missouri also has cross-functional  
8 processes for disconnections and reconnections, in particular, the delayed transfer process,  
9 which was provided to the Commission as part of Spire Missouri's Disconnection and  
10 Reconnection Report filed in File No. GR-2025-0107.

11 **Q. PLEASE EXPLAIN THE DISTINCTION BETWEEN A SOFT AND HARD**  
12 **DISCONNECTION.**

13 A. A hard disconnect occurs when the Company physically turns the gas off entirely. In a soft  
14 disconnect, the customer account is closed, and the gas is left on with the expectation that  
15 a new customer will likely move in. If a certain usage threshold is met, or if a customer  
16 does not move in after a certain period of time, a hard disconnect occurs.

17 **Q. STAFF WITNESS FONTAINE SUGGESTS SPIRE MISSOURI SHOULD ENSURE**  
18 **SOFT DISCONNECTS ARE CLOSELY MONITORED AND HARD**  
19 **DISCONNECTS OCCUR IN A TIMELY MANNER, AND MAKE SURE THERE**  
20 **ARE NOT LARGE REBILLS FOR CUSTOMERS USING SERVICE FOR LONG**  
21 **PERIODS OF TIME WITHOUT BEING BILLED. DO YOU AGREE?**

22 A. Yes, I agree with this recommendation. As indicated above, Spire Missouri has developed  
23 a process to address the delayed transfers (soft disconnects), fully documented the process,

1 and implemented recommendations. In addition, reporting is currently being developed to  
2 track the number of disconnections by disconnection type to provide to Staff. The  
3 Company has implemented changes to the delayed transfer process discussed above that  
4 should alleviate the issue of customers using service for long periods of time without being  
5 billed.

6 **Q. STAFF WITNESS FONTAINE ADDITIONALLY STATES SPIRE MISSOURI**  
7 **SHOULD PROVIDE A MONTHLY REPORT TO CUSTOMER EXPERIENCE**  
8 **DEPARTMENT (“CXD”) STAFF SHOWING THE NUMBER OF DELAYED**  
9 **TRANSFER/VACANT WITH USAGE METERS FOR THE PREVIOUS MONTH.**  
10 **HOW DO YOU RESPOND TO THIS SUGGESTION?**

11 A. The Company agrees with this recommendation, and Spire Missouri plans to provide such  
12 reports going forward.

13 **Q. STAFF WITNESS FONTAINE RECOMMENDS SPIRE MISSOURI SHARE ITS**  
14 **UPDATED CROSS-FUNCTIONAL PROCEDURES WITH CXD STAFF UPON**  
15 **COMPLETION. HOW DO YOU RESPOND TO THIS RECOMMENDATION?**

16 A. I agree with this recommendation. Spire Missouri has completed its review and  
17 documentation of its current practices and procedures for disconnection and reconnections  
18 and supplemented its response with these in Staff data request 0258 on April 26, 2025.  
19 Please see Exhibit JLJ-R1.

20 **Q. STAFF WITNESS FONTAINE RECOMMENDS THAT SPIRE MISSOURI**  
21 **REFINE ITS PROCEDURES FOR PROVIDING NOTICE OF IMPENDING**  
22 **DISCONNECTIONS RELATED TO ACI NON-COMPLIANCE IN THE**  
23 **TIMEFRAME REFERENCED IN ITS LETTERS TO THE CUSTOMER, THAT**

1       **SPIRE MISSOURI NOT SEND SUBSEQUENT LETTERS AFTER THE FINAL**  
2       **NOTICE IS SENT TO CUSTOMERS, AND TO REPORT ITS EFFORTS AND**  
3       **RESULTS TO DO SO TO STAFF ON A QUARTERLY BASIS. HOW DO YOU**  
4       **RESPOND TO THESE RECOMMENDATIONS?**

5    A.   While the Company makes every effort to complete the ACI disconnections in a timely  
6       manner, there are some instances where the disconnection cannot be completed by the date  
7       on the letter and the process has to start over. Spire Missouri tries to complete these in the  
8       warmer months to avoid disconnections during colder weather, based on conversations  
9       with Staff years ago. The Company is dependent on the customer calling to schedule the  
10      inspection. All meters must be inspected every three years. Therefore, the volume of  
11      disconnections that need to be completed make it difficult to disconnect by the date on the  
12      letter or within the 30-day timeframe. However, the Company will review our internal  
13      process to make improvements and communicate these with both Customer Service and  
14      Safety Staff. This matter is also addressed in Spire Missouri's recently filed report,  
15      referenced above, and Spire Missouri plans to improve its procedures surrounding letters  
16      of disconnection related to ACI non-compliance and report its efforts and results to  
17      Commission Staff on a quarterly basis, as suggested.

18   **Q.   STAFF WITNESS FONTAINE SUGGESTS SPIRE MISSOURI SHOULD**  
19       **PROVIDE TO STAFF MONTHLY THE NUMBER OF DISCONNECTIONS FOR**  
20       **EACH REASON BROKEN DOWN DAILY FOR THE PREVIOUS MONTH. IS**  
21       **SPIRE MISSOURI WILLING TO AGREE TO THIS REPORTING**  
22       **REQUIREMENT?**



1 A. Yes. The Company has had discussions on this sort of tracking procedure and agrees with  
2 Staff's recommendation of doing so. Currently, there is no internal report to track the  
3 number of disconnects by reason—however the Company is committed to developing and  
4 implementing a report to do so.

5 **Q. STAFF WITNESS FONTAINE SUGGESTS THAT SPIRE MISSOURI MEET**  
6 **WITH STAFF ON A QUARTERLY, RATHER THAN MONTHLY, BASIS, BUT**  
7 **INFORM STAFF OF CUSTOMER SERVICE AND BILLING ISSUES IF ANY**  
8 **SUCH ISSUES NEED TO BE DISCUSSED OUTSIDE OF THE SCHEDULED**  
9 **QUARTERLY MEETINGS. HOW DO YOU RESPOND TO THIS SUGGESTION?**

10 A. The Company is in agreement with this suggestion and will proactively communicate  
11 customer service and billing issues with Staff if issues happen outside of the scheduled  
12 quarterly meetings.

13 **Q. STAFF WITNESS FONTAINE RECOMMENDS SPIRE MISSOURI CRITICALLY**  
14 **EXAMINE ITS SCHEDULING PROCEDURES TO BETTER MEET THE NEEDS**  
15 **OF ITS CUSTOMERS AWAITING RECONNECTION. HOW DO YOU RESPOND**  
16 **TO THIS RECOMMENDATION?**

17 A. The Company adheres to all rules and tariffs for reconnections but agrees to review its  
18 scheduling procedures to determine if it can more efficiently handle reconnections. As  
19 noted above, Spire Missouri also has cross-functional processes for disconnections and  
20 reconnections, in particular, the delayed transfer process, which was provided to the  
21 Commission as part of Spire Missouri's Disconnection and Reconnection Report filed in  
22 File No. GR-2025-0107.

1 **IV. TRANSPORTATION TARIFFS**

2 **Q. STAFF WITNESS CROWE RECOMMENDS SPIRE MISSOURI ADD TARIFF**  
3 **LANGUAGE BACK TO TARIFF SHEET NOS. 9.12, 9.13, 9.14, AND 9.25. HOW**  
4 **DO YOU RESPOND TO THIS RECOMMENDATION?**

5 A. The Company agrees to add contract demand language back to the tariff sheets listed above.  
6 However, we would note that currently there is not a significant number of customers  
7 utilizing the Contract Demand Option.

8 **Q. BY ADDING BACK IN THE LANGUAGE TO TARIFF SHEET NOS. 9.12, 9.13,**  
9 **9.14, AND 9.25, DO YOU THINK THAT WILL HAVE A SIGNIFICANT IMPACT**  
10 **ON THE COMPANY'S TRANSPORTATION RATE CLASS?**

11 A. No. Spire Missouri currently only has eleven out of five hundred ninety-five Spire Missouri  
12 West transportation customers that utilize the Contract Demand Option.

13 **V. RESIDENTIAL SYSTEM CHARGE, OTHER MISCELLANEOUS CHARGES**  
14 **AND FEES, AND SPECIAL CONTRACT RATES**

15 **Q. ON PAGE 19 OF HIS TESTIMONY, CCM WITNESS CEBULKO STATES SPIRE**  
16 **MISSOURI PROVIDES "MINIMAL JUSTIFICATION" FOR INCREASING THE**  
17 **RESIDENTIAL SYSTEM CHARGE FROM \$20.00 TO \$24.00 A MONTH, A 20%**  
18 **INCREASE. HOW DO YOU RESPOND TO WITNESS CEBULKO'S**  
19 **ARGUMENT?**

20 A. The Company is proposing to add energy efficiency amortizations to the customer charge  
21 since these are known costs and are not subject to change. This is adding recovery certainty  
22 to these costs. The residential customer charges are also supported by the customer costs  
23 identified in the COSS sponsored by Company witness, Tim Lyons from Scott Madden.

1 **Q. ON PAGES 20-21 OF HIS TESTIMONY, CCM WITNESS CEBULKO ARGUES**  
2 **SPIRE MISSOURI'S PROPOSED INCREASE TO ITS CUSTOMER CHARGE IS**  
3 **NOT CONSISTENT TO A LEVEL THAT IS REFLECTED IN MOST**  
4 **NEIGHBORING STATES, AND THE SECOND HIGHEST CUSTOMER**  
5 **CHARGE IN THE MIDWEST EXCEPT FOR OHIO GAS UTILITIES. HOW DO**  
6 **YOU RESPOND?**

7 A. Spire Missouri's customer charge is calculated to cover its fixed costs such as distribution  
8 and customer service-related expenses, along with fixed amortization expense recovery.

9 **Q. CCM WITNESS CEBULKO STATES RESIDENTIAL CUSTOMER**  
10 **ADVOCATES, SUCH AS THE NATIONAL ASSOCIATION OF STATE UTILITY**  
11 **ADVOCATES, WHO PARTICIPATE IN PUBLIC UTILITY COMMISSION**  
12 **PROCEEDINGS RECOMMEND LOWER CUSTOMER CHARGES AS BEST**  
13 **PRACTICE BECAUSE HIGH FIXED CHARGES DISPROPORTIONATELY AND**  
14 **INEQUITABLY INCREASE THE RATES OF LOW-USAGE CUSTOMERS, A**  
15 **GROUP THAT OFTEN INCLUDES LOW-INCOME, ELDERLY, AND**  
16 **MINORITY CUSTOMERS. HOW DO YOU RESPOND?**

17 A. I disagree with this recommendation. Spire Missouri believes its proposed customer  
18 charges for residential customers is an appropriate amount. Lowering the customer charge  
19 would result in an increase in the volumetric rate, an impact that would likely be felt by  
20 customers during the winter when demand is at its peak and gas bills are at their highest.  
21 This would create more strain for our most vulnerable customers. Spire Missouri offers  
22 programs to low income and elderly customers to receive a monthly budget credit and  
23 arrearage repayment. Additionally, The Office of the Public Counsel has also proposed a

1 new Income Eligible Rate which would waive the customer charge for certain income  
2 eligible customers. The Company is open to considering this type of program as discussed  
3 in Spire Missouri witness Dean's rebuttal testimony.

4 **Q. CCM WITNESS THOMAS RECOMMENDS THE COMMISSION: (1) REJECT**  
5 **THE PROPOSED LEVEL OF RATE INCREASE REQUESTED BY SPIRE**  
6 **MISSOURI AND ITS PROPOSED RESIDENTIAL RATE DESIGN AND**  
7 **ELIMINATE OR REDUCE VARIOUS ADDITIONAL FEES AND SURCHARGES**  
8 **THAT SPIRE MISSOURI PROPOSES TO INCREASE; AND (2) DO NOT RAISE**  
9 **THE FIXED CUSTOMER CHARGE FOR RESIDENTIAL CUSTOMERS AND**  
10 **KEEP THE FIXED CUSTOMER CHARGE AT ITS CURRENT LEVEL OF \$20,**  
11 **AS IT IS REGRESSIVE AND FALLS HARDEST ON FAMILIES WITH**  
12 **CHILDREN, MANY SENIORS, THE DISABLED, AND ALL THOSE WITH**  
13 **FIXED INCOME. HOW DO YOU RESPOND?**

14 A. The Company disagrees with this recommendation. As stated above, Spire Missouri offers  
15 many programs, including the Payment Partner Program, to assist customers with a  
16 monthly budget credit, Critical Needs Program, Weatherization and DollarHelp.

17 **Q. CCM WITNESS THOMAS RECOMMENDS THAT ALL OF SPIRE MISSOURI'S**  
18 **RECONNECT CHARGES, COLLECTION TRIP CHARGES, AND PUNITIVE**  
19 **LATE FEES SHOULD BE ELIMINATED. HOW DO YOU RESPOND?**

20 A. The Company agrees with CCM witness Thomas that the collection trip charge be  
21 removed. This was proposed in my direct testimony. The Company disagrees with  
22 eliminating reconnection charges and late fees. Spire Missouri encourages customers to  
23 contact our offices if issues arise so we can help address any problems, challenges, or

1 difficulties they are experiencing. Sometimes customers do not call until they see additional  
2 charges on their bill, and that call allows Spire Missouri to share the programs and assist  
3 the customers who need help. Without those charges it is possible those customers would  
4 not receive benefits they are eligible to receive. This communication helps Spire Missouri  
5 assist its customers and helps them take full advantage of the many programs Spire  
6 Missouri offers to help in certain situations. These types of charges also allow the Company  
7 to offset costs associated with visits.

8 **Q. STAFF WITNESS ROTH PROPOSES AN INCREASE TO THE CUSTOMER**  
9 **CHARGE FOR ALL RATE CLASSES. DO YOU AGREE WITH STAFF WITNESS**  
10 **ROTH?**

11 A. The Company agrees with Staff witness Roth on increasing the customer charge. The  
12 parties are working on determining the appropriate increase to be applied.

13 **Q. WHAT DID STAFF WITNESS ROTH PROPOSE FOR A RESIDENTIAL**  
14 **CUSTOMER CHARGE? DO YOU AGREE WITH STAFF WITNESS ROTH?**

15 A. Staff proposes using a \$27.73 residential customer charge for Spire Missouri East. Staff  
16 proposes using a \$24.76 residential customer charge for Spire Missouri West. The  
17 Company agrees with Staff that the residential customer charge should increase, but the  
18 Company feels its proposal of \$24.00 is a more manageable increase for customers.

19 **Q. ON PAGE 12 OF HER COSS AND RATE DESIGN TESTIMONY, STAFF**  
20 **WITNESS ROTH STATES THAT “AT THIS TIME, STAFF HAS NO CHANGES**  
21 **OR UPDATES TO SPIRE MISSOURI’S MISCELLANEOUS SERVICE**  
22 **CHARGES,” BUT THAT “STAFF WILL CONTINUE TO REVIEW AND**  
23 **RESPOND TO ANY PROPOSALS MADE BY SPIRE MISSOURI IN REBUTTAL**

1       **TESTIMONY.” DOES SPIRE MISSOURI HAVE ANY ADDITIONAL**  
2       **PROPOSALS RELATING TO ITS MISCELLANEOUS SERVICE CHARGES**  
3       **THAT IT WOULD LIKE TO RAISE IN ITS REBUTTAL TESTIMONY?**

4    A.    Spire Missouri is intending to update its advanced meter opt-out monthly charge to be  
5       consistent with the recently enacted Senate Bill 4 legislation.

6    **Q.    ON PAGE 13 OF HER COSS AND RATE DESIGN TESTIMONY, STAFF**  
7       **WITNESS ROTH STATES STAFF DOES NOT HAVE ANY CONCERNS WITH**  
8       **THE CONTINUATION OF THE SPECIAL CONTRACT RATES CURRENTLY IN**  
9       **EFFECT FOR SPIRE MISSOURI, AND THAT STAFF DOES NOT HAVE ANY**  
10       **PROPOSAL REGARDING SPECIAL CONTRACT RATES IN THE EFFECTIVE**  
11       **TARIFF AT THIS TIME. DOES SPIRE MISSOURI HAVE ANY UPDATES TO**  
12       **PROVIDE REGARDING ITS SPECIAL CONTRACT RATES AT THIS TIME?**

13   A.    The Company is in agreement with continuation of these special contract rates and has no  
14       updates to provide at this time.

15                                   **VI.   CONCLUSION**

16   **Q.    DOES THIS CONCLUDE YOUR TESTIMONY?**

17   A.    Yes.

**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     | ) | File No. GR-2025-0107 |
| In the Company's Missouri Service Areas            | ) |                       |

**AFFIDAVIT**

|                   |   |     |
|-------------------|---|-----|
| STATE OF MISSOURI | ) |     |
|                   | ) | SS. |
| CITY OF ST. LOUIS | ) |     |

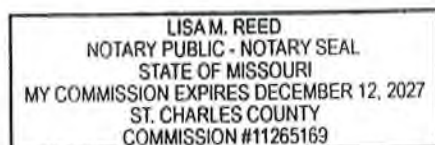
Julie Johnson, of lawful age, being first duly sworn, deposes and states:

1. My name is Julie Johnson. I am Manager, Tariffs & Rates for Spire Missouri Inc.  
My business address is 700 Market St., St. Louis, Missouri 63101.
2. This affidavit is attached to my rebuttal testimony, which is filed on behalf of Spire Missouri Inc.
3. I hereby swear and affirm that my answers to the questions contained in my rebuttal testimony are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Julie Johnson

Subscribed and sworn to before me this 27 day of may 2025.

  
\_\_\_\_\_  
Notary Public



Created: 4/8/2025

Last modified: 4/23/2025

## **Disconnection: ACI**

### **A. Background**

- a. A disconnect for ACI occurs when a current customer fails to schedule an atmospheric corrosion inspection (ACI) for an inside meter.

### **B. Process prior to disconnect**

- a. The disconnect for ACI process begins when a customer does not respond to our communications to schedule an appointment for an ACI.
- b. The case is automatically generated and managed through Spire's billing system 6 months prior to the due date of the inspection, however, the launching of the notifications are currently manual.
- c. The following communications that are sent to customers are sent via USPS letter in all cases, but if a customer has email and text as their preferred method of communication, we also send the notices in those channels:
  - 1. First letter to schedule appointment.
  - 2. Second letter to schedule appointment (10 days after first appt letter).
  - 3. First letter (initial notice) to disconnect (10 days after second appt letter).
  - 4. 96-hour notice letter to disconnect (10 days after first disconnect letter).
  - 5. If the customer has not scheduled their inspection or had their inspection completed and has not gotten their gas disconnected, we start the communications process over again.
- ii. There is variability in the scheduling of these inspections which is dependent on the due dates to ensure the most success and mitigate customer impact of a potential disconnect. For due dates in February through October, Spire begins sending notification letters, texts and emails, on average, 2 months prior to the inspection due dates.
- iii. For January due dates, we send them one month prior. Many customers schedule their inspection and get them done as soon as the first notice goes out. So, in order to not get a large number of inspections due, three years in the future at the end of the year in December, we launch January due date communications one month prior. Typically for January due dates, we do not run any non-compliance disconnects until March, so they have at least 2.5 months to comply with the mandated inspection.
- iv. At times, we will begin sending the notification communications for November and December due dates 3 months prior to hopefully get these accomplished before the colder months of November and December.
- v. The amount of lettering can vary based on when or if the customer schedules and has field activity completed. However, for the customers that do not contact Spire to schedule their inspection, we have to act for non-compliance per PSC compliance guidelines. These customers have typically received 4-6 letters that would include 2-3 disconnect letters during the



process before we have to possibly disconnect for non-compliance per PSC guidelines.

- vi. This process is managed with a case in our billing system. The case is generated, automatically, however the notifications are triggered manually.

C. Completing the disconnect

- a. When on premises, the technician must knock on the door and attempt to perform the ACI.
- b. If the customer is not home, the customer is left without gas service and the technician leaves a door hanger with information on how to reconnect service.

D. Other

- a. These field activities are routed to third parties and Spire employees.

**Reconnection: ACI**

- A. Process for requesting reconnect
  - a. When a customer calls, a reconnect field activity will be created.
- B. Process for scheduling reconnect
  - a. The reconnect field activity will be worked as an emergency no-gas same day.
- C. Other
  - a. Reconnect for ACI field activities are routed to third parties or Spire technicians.
  - b. Technicians contact the customer when en route to complete the field activity.

Created: 4/8/2025

Last modified: 4/23/2025

## **Disconnection: Delayed transfer**

### **A. Background**

- a. A disconnect for delayed transfer occurs when an existing customer moves out of a premises, and a new occupant moves in but fails to establish themselves as a customer.

### **B. Process prior to disconnect**

- a. When a current customer calls to stop service, a stop service order is entered for the requested date. At the end of the billing cycle, a bill will generate with the meter reading from the date of the stop service. If auto pay is active, the payment for the final bill is drafted on the due date.
- b. Service is not physically stopped at this point and is considered a soft disconnect.
- c. If no start service is requested at the premises within 30 days and no gas has been used, a disconnect service point field activity is automatically created and then routed by the workload planning team.
- d. If 30 days have passed and gas has been used but has not reached 10 Ccf in the summer or 40 Ccf in the winter, a letter is generated and sent to the occupant at the service address. This letter notifies the occupant to call us to apply for service or the gas will be disconnected.
- e. If the usage exceeds 10 Ccf in the summer or 40 Ccf in the winter before 30 days have passed, a letter is generated and sent to the occupant at the service address. This letter notifies the occupant to call us to apply for service or the gas will be disconnected.
- f. If the occupant has not applied for service within 10 days, a field activity is automatically created to have the service physically stopped (a hard disconnect) and then is routed by the workload planning team.

### **C. Completing the disconnect**

- a. When on premises, the technician must knock on the door and inform the resident that service is being disconnected. The technician will provide the resident a flyer with information on how to reconnect but cannot accept payment to stop the disconnect.
- b. If there is no answer at the door, the technician completes the disconnect and leaves a door hanger with information on how to reconnect service.

### **D. Other**

- a. These field activities are routed to third parties and Spire employees.
- b. These field activities are worked Monday through Thursday, 8:00 AM to 4:00 PM, excluding holidays and the day before a holiday.

## **Reconnection: Delayed transfer**

- A. Process for requesting reconnect/start service
  - a. When a customer requests a reconnect via the IVR, online, or over the phone with a representative, the representative will explain the process to start service.
  - b. A service initiation fee will be charged. The customer may choose to pay immediately, add to the next bill or spread out over the next three bills.
  - c. If the customer has previous debt at another location, we will request payment prior to starting service.
- B. Process for scheduling reconnect<sup>1</sup>
  - a. If a customer requests a start service Monday through Friday, 7:00 am to 7:00 pm, the field activity will be scheduled and worked within the three-working day requirement for a start service.
  - b. If a customer requests a reconnect after hours, the field activity will be generated for within the next three-working days, which is typically three days later, but could be greater if the three-working days spans a weekend or holiday.
- C. Other
  - a. Start service orders are routed to internal employees only.
  - b. Technicians contact the customer when en route to complete the field activity.
  - c. If the customer is not home, the technician will leave a door hanger with information requesting that the customer to reschedule.

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<sup>1</sup> This will change from three days to next working day by June 1, 2025.

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### **Disconnection: Hazardous condition**

#### **A. Background**

- a. A disconnect for a hazardous condition occurs when a third-party contractor working on behalf of Spire or a Spire technician find a hazardous condition while performing pre-scheduled work at a premise.

#### **B. Process prior to disconnect**

- a. Every situation is different, but the technician will always inform the customer of the hazard and the reason the gas service needed to be disconnected. If the hazard exists on a customer owned fuel run or appliance, the technician informs the customer to reach out to a qualified professional for necessary repairs. We have a preferred contractor list on our website that the customer can be directed to.
- b. If the hazard is on a Spire facility, the technician will notify the customer in person and explain the hazard and the reason the disconnect must occur. The repairs will then be made, and service will be restored.

#### **C. Completing the disconnect**

- a. When on premises, the technician must knock on the door and inform the resident that service is being disconnected for a hazardous condition. If the hazardous condition is on customer owned property, the technician hands the resident a door hanger with information on how to reconnect after the necessary repairs are completed.
- b. If the customer is not home, the customer is left without gas service and the technician leaves a door hanger with information on how to reconnect service.

#### **D. Other**

- a. These field activities are routed to third parties and Spire employees.

**Reconnection: Hazardous condition**

- A. Process for requesting reconnect
  - a. For Spire hazards
    - i. When a customer calls, a reconnect field activity will be created.
  - b. For customer hazards
    - i. Once all hazards are remedied, when a customer calls, a reconnect field activity will be created.
- B. Process for scheduling reconnect
  - a. The reconnect field activity will be worked as an emergency no-gas same day.
- C. Other
  - a. Reconnect for hazardous condition field activities are routed to internal employees only.
  - b. Technicians contact the customer when en route to complete the field activity.

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### **Disconnection: Planned maintenance and upgrades**

**A. Background**

- a. A disconnect for maintenance or upgrades occurs when a customer must be disconnected to perform planned maintenance or upgrades and the customer is not home.

**B. Process prior to disconnect**

- a. An attempt is made to contact the customer via a phone call or face-to-face conversation. A door hanger is left if the customer is not home.
- b. If communication was not established after the first door hanger is left and the customer is still not home, a second door hanger is left requesting the customer contact us. This door hanger is placed on a Thursday. This gives the customer Friday, Saturday, Sunday, and Monday to call us to schedule. If we do not hear from the customer by the close of business on Monday the existing service will be abandoned on Tuesday to allow the project to proceed.

**C. Completing the disconnect**

- a. If the customer is not home, the customer is left without gas service and the technician leaves a door hanger with information on how to reconnect service.

**D. Other**

- a. These field activities are routed to third parties and Spire employees.

**Reconnection: Planned maintenance and upgrades**

- A. Process for requesting reconnect
  - a. When a customer calls, a reconnect field activity will be created.
- B. Process for scheduling reconnect
  - a. The reconnect field activity will be worked as an emergency no-gas same day.
- A. Other
  - a. Reconnect for maintenance and upgrades field activities are routed to third parties or Spire technicians.
  - b. Technicians contact the customer when en route to complete the field activity.



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## **Disconnection: Advanced meter exchange**

### **A. Background**

- a. A disconnect for a meter exchange occurs when customers do not setup an appointment for an advanced meter exchange and have a no-access outside meter or an inside meter. Otherwise, the exchanges can occur without an appointment and without interruption to service.
- b. Workload planning determines where and when these exchanges will be worked, and they manually generate the case to begin the process.

### **B. Process prior to disconnect**

- a. In Summer 2024, we sent a postcard to all customers that needed a meter exchange explaining the meter exchange initiative and why we were doing it.
- b. After the initial postcard, when a case to exchange a meter is created, a postcard and email are sent to the customer requesting them to schedule a meter exchange.
- c. If the customer does not schedule a meter exchange after receiving the postcard or email, we will proactively reach out to the customers at a later date via phone, text or email depending on the customers preferred method of contact.
- d. If we are unable to contact the customer, we will still attempt to exchange the meter.

### **C. Completing the disconnect**

- a. The technician will call the customer before arriving at the premises to exchange the meter.
- b. When on premises, the technician must knock on the door and inform the resident that a meter exchange needs to occur. If the customer is home, the technician will perform the meter exchange.
- c. If there is no answer at the door, the technician completes the disconnect and leaves a door hanger with information on how to reconnect service.
- d. After the disconnect is performed, an emergency no gas field activity will be automatically created and added to the account waiting for the customer to call the emergency line to get their gas reconnected.
- e. If the customer has set their communications preferences as email and/or text, an automated text message and/or email is sent advising them of the disconnection and how to get their gas restored.

### **D. Other**

- a. These field activities are routed to third parties and Spire employees.

**Reconnection: Advanced meter exchange**

- A. Process for requesting reconnect
  - a. When a customer calls, a reconnect field activity will be created.
- B. Process for scheduling reconnect
  - a. The reconnect field activity will be worked as an emergency no-gas same day.
- C. Other
  - a. Reconnect from meter exchange field activities are routed to third parties or Spire technicians.
  - b. Technicians contact the customer when en route to complete the field activity.

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## **Disconnection: Non-payment**

### **A. Background**

- a. A disconnect for non-payment occurs when a current customer fails to pay their bill on time.

### **B. Process prior to disconnect**

- a. The disconnect for non-payment process begins when a bill is unpaid after its due date – usually 15 days after the bill's issuance. A late fee is assessed at 6 days past due.
- b. If the bill is still unpaid 3 days after the due date, an automated friendly reminder call is made to the customer.
- c. If the bill is still unpaid when the next bill generates (on or about 30 days after the first bill date,) an initial notice of disconnect is printed on the customer's bill and a separate Disconnect Letter is included with the bill detailing options for the customer to stay connected.
- d. If the bill is still unpaid 52 days after the bill date, two automated 96-hour warning calls are made to the customer. The first call is made around 9 am, and the 2<sup>nd</sup> call around 5 pm.
- e. If the bill is still unpaid 53 days after the bill date, a disconnect field activity is created.
- f. If the bill is still unpaid 4 days later (56 days after the bill date), two additional automated 96-hour warning calls are made to the customer, again around 9 am and 5 pm.
- g. If the bill is still unpaid 4 days later (60 days after the bill date), two additional automated 96-hour warning calls are made to the customer, again around 9 am and 5 pm.
- h. These calls end when 1) the customer pays, 2) the disconnect field activity is completed, or 3) when the customer account rebills. In this case, the disconnect field activity is canceled, and the process restarts.

### **C. Completing the disconnect**

- a. When on premises, the technician must knock on the door and inform the resident that service is being disconnected for non-payment. The technician hands the resident a door hanger with information on how to reconnect but cannot accept payment to stop the disconnect.
- b. If there is no answer at the door, the technician completes the disconnect and leaves a door hanger with information on how to reconnect service.

### **D. Other**

- a. These field activities are primarily routed to third parties but can be routed to Spire employees too.
- b. These field activities are worked Monday through Thursday, 8:00 AM to 4:00 PM, excluding holidays and the day before a holiday. Spire also adheres to Cold Weather Disconnection rules during winter months:

- i. The Cold Weather Rule applies to November 1 through March 31 each year and adds restrictions to this process.
- ii. Disconnections for non-payment are not conducted during this period if the National Weather Service local forecast between 6:00 am and 9:00 am, for the following twenty-four hours, predicts that the temperature will drop below 32 degrees Fahrenheit.
- iii. Disconnections for non-payment are also prohibited during this period, provided:
  - 1. The customer contacts Spire and states their inability to pay in full;
  - 2. The customer both agrees to a payment arrangement with Spire and pays an initial sum that complies with the rules in 4 CSR 240-13.055 (10);
  - 3. The customer complies with Spire's request for information regarding the customer's monthly or annual income; and
  - 4. There is no other lawful reason for disconnection of service.
- c. Technicians do not contact the customer when en route to complete the field activity.

## **Reconnection: Non-payment**

- A. Process for requesting reconnect
  - a. When a customer requests a reconnect via the IVR, online, or over the phone with a representative, they are given a dollar amount needed to reconnect service.
    - i. This dollar amount will include the past due balance, a reconnect fee, and may include a deposit
  - b. Once the payment is taken a field activity is generated.
    - i. If the customer cannot pay, the customer can be referred to agencies for assistance or based on the time of year, a payment plan can be discussed.
- B. Process for scheduling reconnect
  - a. If a customer requests a reconnect Monday through Friday, 7:00 am to 7:00 pm, the field activity will be generated for the next available working day, which is typically the next day.
    - i. In some rare instances, we can route a technician to reconnect on a same-day basis
  - b. If a customer requests a reconnect after hours, the field activity will be generated for the next available working day, which is typically two days later, but could be greater if the next available working day spans a weekend or holiday.
- C. Other
  - a. Reconnect from non-payment field activities are routed to internal employees only.
  - b. Technicians contact the customer when en route to complete the field activity.
  - c. If the customer is not home, the technician will leave a door hanger with information requesting that the customer to reschedule.

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**Disconnection: Unauthorized consumption – diversion or locked meter**

- A. Background
  - a. A disconnect for unauthorized consumption occurs when a meter that has been locked and should not show consumption begins registering consumption.
- B. Process prior to disconnect
  - a. The system monitors meters for usage that are locked. If the usage exceeds 2 Ccf within a 5-day window a letter is generated and sent to occupant at the service address. This letter notifies the occupant to call us to apply for service or the gas will be disconnected.
  - b. If the occupant has not applied for service within 10 days, an order is automatically created to have the service physically stopped and is automatically routed through workforce management system like any other priority order.
- C. Completing the disconnect
  - a. Missouri East
    - i. When on premises, the technician will knock on the door with a uniformed officer and inform the occupant that service is being disconnected. If the occupant is not home, a door hanger will be left with information on how to reconnect service.
  - b. Missouri West
    - i. When on premises, the technician completes the disconnect and leaves a door hanger with information on how to reconnect service.
- D. Other
  - a. These field activities are routed to third parties and Spire employees.

**Reconnection: Unauthorized consumption – diversion or locked meter**

- A. Process for requesting reconnect/start service
  - a. When a customer requests a reconnect via the IVR, online, or over the phone with a representative, the representative will explain the process to start service.
  - b. A service initiation fee will be charged and the amount owed for the unauthorized consumption will be calculated and we will request payment prior to starting service.
- B. Process for scheduling reconnect
  - a. If a customer requests a start service Monday through Friday, 7:00 am to 7:00 pm, the field activity will be scheduled and worked within the three-working day requirement for a start service.
  - b. If a customer requests a reconnect after hours, the field activity will be generated for within the next three-working days, which is typically three days later, but could be greater if the three-working days spans a weekend or holiday.
- C. Other
  - a. Start service orders are routed to internal employees only.
  - b. Technicians contact the customer when en route to complete the field activity.
  - c. If the customer is not home, the technician will leave a door hanger with information requesting that the customer to reschedule.