

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

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| 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 |) | |

**RESPONSE TO OFFICE OF THE PUBLIC COUNSEL
DATA REQUEST(S) 8002-8008**

Spire Missouri Inc. ("Spire") received data request(s) 8002-8008 from the Office of the Public Counsel on April 29, 2025, with a due date of May 9, 2025. Spire provides the following responses to data request(s) 8002-8008 as follows. For convenience, Spire includes each data request followed by Spire's response.

DR 8002

Please provide a detailed explanation of how the new rates from this rate case will be applied to billing data in circumstances where the effective date of the new rates falls within an existing billing cycle. For example, if new rates go into effect on October 24, 2025, how will the new rates be applied to the usage of a customer whose billing cycle usage runs from October 1, 2025 through October 30, 2025?

Response:

Please see attachment explaining proration.

Signed by: Julie Johnson

DR 8003

Please identify whether Spire's existing billing system is capable of applying rates to customer's billing cycle usage on a pro rata basis based on actual daily usage to address changes that occur within a billing period. If new rates go into effect on October 24, 2025, for example, is Spire's existing billing system capable of charging customers on the old rates for actual usage for the period from October 1, 2025, through October 23, 2025, and then based on the new rates from October 24, 2025, through October 30, 2025 for the actual usage for those days?

Response:

Spire's current system is not capable of prorating rate changes by applying actual daily usage. The billing system, Oracle Customer Care & Billing (CCB) does not store or have access to every meter's actual daily reading – these are stored in an external meter data management (MDM) system. CCB does not have the ability to retrieve daily reads from the MDM during the billing calculation process. Please see DR 8002 for the proration process.

Signed by: Julie Johnson

DR 8004

If Spire's existing billing system is not capable of applying rates on a pro rata basis based on actual daily usage to address changes that occur within a billing period, please identify whether the Company has undertaken any evaluation to determine whether its system could be made capable of performing such a task.

Response:

Spire is currently reviewing a potential transition from CCB to Oracle's next generation billing system, Customer to Meter (C2M), which does have an integrated MDM. We have not yet evaluated whether C2M is capable of proration based on actual daily usage.

Signed by: Julie Johnson

DR 8005

If Spire has undertaken any evaluation as identified in data request 8004, please provide copy of any documentation produced as a result of that evaluation including, without limitation, any reports, assessments, cost analysis, requests for proposal, internal presentations, external presentations, and memorandums.

Response:

Spire has not completed any evaluations at this time.

Signed by: Julie Johnson

DR 8006

For the purpose of this data request, assume a scenario where Spire Missouri is authorized by the Missouri Public Service Commission to begin charging new rates that go into effect on October 24, 2025. Regarding billing cycle usage: can Spire's smart metering infrastructure currently determine the actual usage of all customers both before and after October 23, 2025, in order to apply the rates that were effective at the time the natural gas was use?

Response:

While the Company can view reads from before and after a specific date, our current billing system, CCB, has no way to obtain information from the current MDM (workbench) to use when calculating prorated bills.

Once we have a network in place to obtain real time reads and transmit those reads to a billing system capable of using daily reads, billing based on actual reads before and after the rate change may be possible.

Signed by: Julie Johnson

DR 8007

If the response to data response 8006 was that Spire's smart metering infrastructure could not currently operate as specified, please provide a detailed explanation as to why this is the case.

Response:

Please see response to DR 8006. CCB has no way to obtain and use information from the MDM workbench. Meaning the systems that would be needed to operate as specified in DR 8006 do not have the ability to communicate with each other across platforms.

Signed by: Julie Johnson

DR 8008

If the response to data response 8006 was that Spire's smart metering infrastructure could currently operate as specified, please identify whether or not it would be Spire's intention to prorate customers' bills to address the change in rates on October 24th as specified in the scenario described in data request 8006. In answering this question, please explain why or why not.

Response:

Please see response to DR 8006. Billing could not operate as hypothetically specified. Spire's billing system, CCB, cannot receive daily reads and bill based on those reads.

Signed by: Julie Johnson