

Exhibit No.:
Issues: Class Cost of Service/Rate Design
Witness: Jessica A. York
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Missouri Industrial Energy Consumers
Case No.: GR-2025-0107
Date Testimony Prepared: June 30, 2025

**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 Area**

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) **Case No. GR-2025-0107**
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Surrebuttal Testimony and Schedule of

Jessica A. York

On behalf of

Missouri Industrial Energy Consumers

June 30, 2025



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STATE OF MISSOURI)

) SS

COUNTY OF ST. LOUIS)

Affidavit of Jessica A. York

Jessica A. York, being first duly sworn, on her oath states:

1. My name is Jessica A. York. I am a consultant with Brubaker & Associates, Inc., having its principal place of business at 16690 Swingley Ridge Road, Suite 140, Chesterfield, Missouri 63017. We have been retained by the Missouri Industrial Energy Consumers in this proceeding on their behalf.

2. Attached hereto and made a part hereof for all purposes are my surrebuttal testimony and schedule which were prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. GR-2025-0107.

3. I hereby swear and affirm that the testimony and schedule are true and correct and that they show the matters and things that they purport to show.



Jessica A. York

Subscribed and sworn to before me this 30th day of June, 2025.





Notary Public

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Surrebuttal Testimony of Jessica A. York**

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Schedule JAY-S-1: Staff’s Response to Data Request No. 334 (MIEC 1-1)

**In the Matter of Spire Missouri Inc. d/b/a Spire's)
Request for Authority to Implement a General) Case No. GR-2025-0107
Rate Increase for Natural Gas Service Provided)
in the Company's Missouri Service Area)**

1 I address certain concerns regarding the Missouri Public Service Commission
2 (“Commission”) Staff (“Staff”) witness Ms. Roth’s Rebuttal Testimony on class cost of
3 service and revenue allocation.

4 My silence with respect to any issues addressed by any other party’s testimony
5 in this proceeding should not be taken as tacit approval or agreement regarding those
6 issues.

7 **I. RESPONSE TO**
8 **SPIRE WITNESS MR. LYONS**

9 **Q PLEASE SUMMARIZE THE ISSUES RAISED IN MR. LYONS’ REBUTTAL**
10 **TESTIMONY TO WHICH YOU WILL RESPOND.**

11 A I will address Mr. Lyons’ response to my proposed class revenue apportionment for
12 Spire East.

13 **Q WHAT WAS MR. LYONS’ RESPONSE TO YOUR RECOMMENDATION IN THIS**
14 **REGARD?**

15 A I recommended that classes be moved 50% toward cost of service, rather than the
16 Company’s proposed 10% movement toward cost of service. Mr. Lyons’ and MIEC
17 agree with the objective of striking a balance between movement to cost-based rates
18 and gradualism. However, he believes that moving 10% toward cost of service better
19 reflects that balance.

1 **Q DOES A 10% MOVEMENT TOWARD COST OF SERVICE REFLECT A**
2 **REASONABLE BALANCE BETWEEN MOVEMENT TO COST-BASED RATES AND**
3 **GRADUALISM?**

4 A No. A 10% movement toward cost of service equates to approximately a system
5 average increase for the Residential class, and several other classes. A system
6 average increase does not make meaningful movement toward cost of service in this
7 case. This was shown in Table 2 of my Direct Testimony.

8 On the other hand, a 50% movement toward cost of service is much more
9 meaningful for several classes, and has little impact on the Residential class relative to
10 the Company's proposal. As explained in my Direct Testimony, at the Company's
11 claimed revenue deficiency, the difference between a 50% movement toward cost of
12 service and a 10% movement toward cost of service equates to about \$0.50 per month
13 for each Residential customer relative to the Company's proposed revenue spread.¹ A
14 50% movement toward cost of service is reasonable and should be adopted by the
15 Commission.

16 **Q DO YOU HAVE ANY FURTHER ARGUMENT AGAINST A 10% MOVEMENT**
17 **TOWARD COST OF SERVICE?**

18 A Yes. A 10% movement toward cost of service would theoretically take 10 rate cases
19 to achieve cost based rates. If a utility files a rate case every two to three years, full
20 cost of service would not be reached for 20 to 30 years. This is unreasonable and
21 should be rejected.

¹Direct Testimony of Jessica York at page 17, lines 3-13.

**II. RESPONSE TO
STAFF WITNESS KERI ROTH**

Q MS. ROTH'S REBUTTAL TESTIMONY ACKNOWLEDGED SEVERAL ERRORS THAT WERE CONTAINED IN THE CLASS COST OF SERVICE FILED WITH HER DIRECT TESTIMONY. HAVE THOSE ERRORS BEEN CORRECTED?

A Corrections have not been provided to MIEC prior to the filing date of this Surrebuttal Testimony. Indeed, Ms. Roth indicated in response to a discovery request from MIEC that she intends to provide a corrected class cost of service study, and potentially an updated revenue allocation, with her Surrebuttal Testimony on June 30.² Thus, MIEC is unable to respond to Ms. Roth's corrections and modifications in this Surrebuttal Testimony.

Q HAS MIEC TAKEN STEPS TO TRY TO ENSURE IT HAS AN OPPORTUNITY TO FILE ADDITIONAL TESTIMONY RESPONDING TO THE CORRECTIONS AND MODIFICATIONS INCLUDED IN MS. ROTH'S SURREBUTTAL TESTIMONY?

A Yes. MIEC filed a motion on June 25, 2025 requesting permission to file testimony on July 18, 2025, addressing any remaining issues in Ms. Roth's class cost of service study, as well as responding to any changes made by Ms. Roth to the class revenue apportionment relative to that included with her Direct Testimony.

Q DO YOU HAVE ANY OTHER COMMENTS ON STAFF'S CLASS COST OF SERVICE STUDY AT THIS TIME?

A Yes. The class cost of service study filed by Staff in its Direct Testimony should be given absolutely no weight by the Commission for any decision making purposes in this

²Staff's Response to Data Request No. 334 (MIEC 1-1). Included as Schedule JAY-S-1.

1 case. To the extent that parties are denied an opportunity to respond to any corrections
2 or modifications that are presented in Staff's Surrebuttal Testimony, then no weight
3 should be given to the updated class cost of service study either.

4 **Q DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

5 **A** Yes, it does.

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Data Request Response 334 – Case No. GR-2025-0107

MIEC 1-1. Please refer to the Rebuttal Testimony of Keri Roth at page 6 through page 8, lines 1 7.

a. Please identify the date when Ms. Roth expects to file an updated Class Cost of Service Study (“CCOSS”) correcting the errors identified on the referenced pages of Ms. Roth’s Rebuttal Testimony.

Response: Due to ongoing auditing adjustments, an updated Class Cost of Service study (“CCOS”) will be provided as soon as possible. At this time Staff expects to file an updated CCOS as part of Surrebuttal testimony.

b. Will Ms. Roth provide the corrected CCOSS before Surrebuttal Testimony is due? If so, how far in advance of Surrebuttal Testimony does Ms. Roth anticipate filing the corrected CCOSS?

Response: At this time Staff expects to file an updated CCOS as part of Surrebuttal testimony.

c. Please provide the Missouri Industrial Energy Consumers (“MIEC”) with a copy of the corrected CCOSS model, in electronic spreadsheet format with all formulas and links intact, as soon as it is available.

Response: Staff will provide an updated CCOS, in electronic spreadsheet format, as soon as it becomes available.

d. Please provide MIEC with all workpapers relied upon by Ms. Roth to develop the corrected CCOSS as soon as they are available. Please provide all workpapers in electronic spreadsheet format with all formulas and links intact.

Response: Staff will provide all updated workpapers, in electronic spreadsheet format, relied upon to develop the corrected CCOS as soon as they become available.

e. Please indicate whether or not the corrected CCOSS contemplated in Ms. Roth’s testimony will be the final CCOSS Ms. Roth anticipates filing in this case on behalf of Missouri Public Service Commission (“Commission”) Staff (“Staff”) (i.e., reflecting Staff’s final revenue requirement, billing units, and allocation factors).

Response: Surrebuttal is the final opportunity to file a CCOS study in this case.

f. Does Ms. Roth anticipate changing the revenue allocation recommendations shown in the tables on page 8 of her Direct Testimony based on her corrected CCOSS? If yes, please provide

Ms. Roth's updated revenue allocation recommendation based on the results of her corrected CCOS, when the corrected CCOS is available.

Response: Staff's updated CCOS study will include any changes in the amount of revenue allocated to the various customer classes due to corrections as well as updates to the inputs in the CCOS study. Staff's policy goals, as described in CCOS testimony, remain unchanged. Staff will provide the results of the updated and corrected CCOS when it becomes available.