

Exhibit No.:
Issue(s): *Distribution Service
Adjustment*
Witness: *Michael J. Abbott*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Surrebuttal /
Cross-Surrebuttal Testimony*
Case No.: *GR-2025-0107*
Date Testimony Prepared: *June 30, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER, SEWER, GAS, AND STEAM DEPARTMENT

**SURREBUTTAL / CROSS-SURREBUTTAL
TESTIMONY**

OF

MICHAEL J. ABBOTT

**SPIRE MISSOURI INC.,
d/b/a Spire**

CASE NO. GR-2025-0107

Jefferson City, Missouri
June 2025

1 **SURREBUTTAL / CROSS-SURREBUTTAL**

2 **TESTIMONY OF**

3 **MICHAEL J. ABBOTT**

4 **SPIRE MISSOURI INC.,**
5 **d/b/a Spire**

6 **CASE NO. GR-2025-0107**

7 Q. Please state your name and business address.

8 A. My name is Michael J. Abbott and my business address is 200 Madison Street,
9 Jefferson City, MO 65102.

10 Q. Are you the same Michael J. Abbott that filed direct testimony on April 23, 2025,
11 and rebuttal testimony on May 30, 2025, for this proceeding?

12 A. Yes, I am.

13 Q. What is the purpose of your surrebuttal / cross-surrebuttal testimony?

14 A. The purpose of my surrebuttal testimony is to describe the Missouri Public
15 Service Commission (“Commission”) Staff’s (“Staff”) recommendations to the Commission
16 regarding Spire Missouri Inc., d/b/a Spire’s (“Spire Missouri”) proposed Distribution Service
17 Adjustment (“DSA”).

18 **DISTRIBUTION SERVICE ADJUSTMENT**

19 Q. Spire Missouri witness David Yonce claims that decoupling only serves to
20 ensure that a utility will recover its authorized revenues.¹ Does Staff agree with this statement?

¹ David Yonce rebuttal testimony, page 5, lines 13 and 14.

1 A. Staff agrees that decoupling guarantees² that a utility will recover Commission
2 approved revenue requirement from eligible customer classes, which means the residential class
3 and the smallest general service class.³ Staff would also like to point out that Mr. Yonce
4 misquoted his direct testimony by indicating in his rebuttal testimony, “decoupling only serves
5 to ensure....”⁴ More exactly, Mr. Yonce states in his direct testimony, “...DSA only
6 ensures that the Company recovers its authorized revenues....”⁵ Therefore, Staff agrees that
7 Spire Missouri’s proposed DSA guarantees that Spire Missouri will recover the Commission
8 approved revenue from the Residential class and Small General Gas Service class.

9 Q. Did Mr. Yonce provide a sufficient argument for his statement, that “...if the
10 utility does not operate efficiently, it will still not earn its authorized return?”⁶

11 A. No. Mr. Yonce’s rebuttal testimony did not provide any argument in support of
12 this claim or any metrics describing how Spire Missouri will account for inefficient operations
13 impacting its ability to earn the authorized revenue. As clearly stated by Mr. Yonce,
14 “...the DSA only serves to ensure that a utility will recover its authorized revenues....”⁷
15 Meaning the DSA does not provide any additional mechanisms to ensure that Spire Missouri
16 operates efficiently and does not establish how inefficient operations would negatively impact
17 Spire Missouri’s ability to recover the Commission approved revenue requirement for
18 impacted customers.

² Merriam-Webster establishes one of the synonyms for ‘ensure’ is guarantee. <https://www.merriam-webster.com/thesaurus/ensure>

³ Section 386.266.3, RSMo.

⁴ David Yonce rebuttal testimony, page 5, line 13.

⁵ David Yonce direct testimony, page 13, lines 14 and 15.

⁶ David Yonce rebuttal testimony, page 5, lines 14 and 15.

⁷ David Yonce direct testimony, page 13, lines 13 and 14.

RECOMMENDATIONS AND SUMMARY

Q. What are Staff's recommendations to the Commission regarding Spire Missouri's proposed DSA?

A. Staff continues to recommend the Commission reject Spire Missouri's proposed DSA. In addition to the reasons discussed in both Staff's direct and rebuttal testimonies,⁸ Spire Missouri's DSA only guarantees Spire Missouri will obtain the revenue requirement from both the residential and small general service classes. It does not provide any metrics regarding the impacts to Spire Missouri's ability to achieve the revenue requirement if Spire Missouri is subject to inefficient operations.

In the event that the Commission approves Spire Missouri's proposed DSA, Staff recommends that the Commission require Spire Missouri to work with Staff, Office of Public Counsel, and any other interested parties determined appropriate by the Commission to develop efficient operations metrics with the purpose of establishing impact consequences regarding the ability of Spire Missouri to recover the full Commission approved revenue requirement for residential and small general services.

Q. Does this conclude your surrebuttal / cross-surrebuttal testimony?

A. Yes, it does.

⁸ Michael J. Abbott direct testimony filed May 7, 2025; and rebuttal testimony filed May 30, 2025, pages 1-7.

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

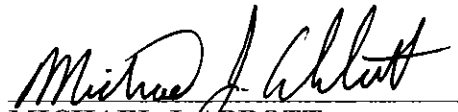
AFFIDAVIT OF MICHAEL J. ABBOTT

STATE OF MISSOURI)
)
COUNTY OF COLE)

ss.

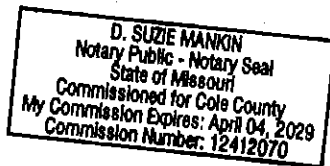
COMES NOW MICHAEL J. ABBOTT and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Michael J. Abbott*; and that the same is true and correct according to his best knowledge and belief.

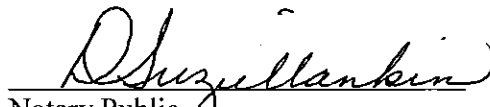
Further the Affiant sayeth not.


MICHAEL J. ABBOTT

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 25th day of June 2025.




Notary Public