

Exhibit No.:
Issue(s): Depreciation
Witness: Malachi Bowman
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

ENGINEERING ANALYSIS DEPARTMENT

**SURREBUTTAL / CROSS-SURREBUTTAL
TESTIMONY**

OF

MALACHI BOWMAN

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

CASE NO. GR-2025-0107

*Jefferson City, Missouri
June 2025*

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SURREBUTTAL / CROSS-SURREBUTTAL

TESTIMONY OF

MALACHI BOWMAN

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

CASE NO. GR-2025-0107

Q. Please state your name and business address.

A. My name is Malachi Bowman and my business address is 200 Madison St,
Jefferson City, MO 65102.

Q. By whom are you employed and in what capacity.

A. I am employed by the Missouri Public Service Commission (“Commission”) as
an Associate Engineer in the Engineering Analysis Department, Industry Analysis Division.

Q. Are you the same Malachi Bowman who filed direct testimony on April 23,
2025, and rebuttal testimony on May 30, 2025 in this case?

A. Yes, I am.

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

A. The purpose of my testimony will be to respond to Spire Missouri Inc.,
d/b/a Spire (“Spire Missouri”) Witness John J. Spanos’ rebuttal testimony regarding changes in
depreciation rates and the differences between Staff and Spire Missouri witness Spanos’
depreciation methods. I will also provide a revised depreciation schedule with the general plant
amortization rates updated, along with reasoning for the remaining depreciation rate differences
between Staff and Spire Missouri.

Differences in Depreciation Methods between Staff and Mr. Spanos

Q. How do you respond to Mr. Spanos' characterization of your testimony that you suggest estimating service lives is simply a mathematical exercise?

A. Mr. Spanos stated that my direct testimony suggested "that estimating service lives is simply a mathematical exercise in which computations of historical accounting data are all that is needed to determine reasonable estimates."¹ But the goal of my testimony was not to suggest that estimating service lives is simply a mathematical exercise or that historical accounting data is all that is needed to determine reasonable rates. On the contrary, I agree with Mr. Spanos that the selection of future service lives for a given account should not be solely based on the analysis of historical data but should consider other factors that could influence the future life of the property along with expert judgment. In my direct testimony I stated:

. . . historical data, **along with other factors that could influence the future life of the property, and expert judgement** is used to determine the average service life of the account.²

The goal of analyzing historical data is to forecast what the future life of the account may be. With that being said, the historical data should be seen as a starting point and the analyst should use the historical data, along with expert judgement, to determine the service life of a given account.

Mr. Spanos' Depreciation Rate Corrections

Q. Did Mr. Spanos provide updated depreciation rates in rebuttal?

¹ Mr. Spanos' Rebuttal Testimony, Page 3, Lines 8-11.

² Malachi Bowman Direct Testimony, Page 4, Lines 11-13, Emphasis added.

A. Yes. Upon reviewing Staff's documentation related to service lives in this case, Mr. Spanos discovered duplicate entries within the historical data and revised several service life estimates which impacted his recommended depreciation rates.³

Q. What were Mr. Spanos' changes to his recommended depreciation rates?

A. I have attached Schedule MB-s1 to show the changes between his recommended depreciation rates. Staff has found many of Mr. Spanos' revised service live and net salvage selections to be reasonable. Additionally, Spire Missouri has responded to several data requests that have provided Staff with additional information to be used in judgement for determining the service life and net salvage values for several accounts.

Q. Does Staff agree with all of Mr. Spanos' revised rates?

A. No, there are still 11 accounts which Staff continues to hold the position that its rates are more reasonable.

Accounts Where Mr. Spanos and Staff Disagree

Q. Which accounts does Staff continue to disagree with?

A. Below are the accounts due to service life selections or net salvage differences:

<u>Account</u>	<u>Account Name</u>	<u>Staff's Recommended Rate</u>	<u>Mr. Spanos' Recommended Rate</u>
305000	Structures and Improvements	1.77%	1.91%
353000	Lines	1.56%	1.79%
376300	Plastic Mains	2.00%	2.31%

³ Mr. Spanos Rebuttal Testimony, Page 2, Lines 4-6.

And below are accounts where Staff and Mr. Spanos disagree on depreciation rates but agree on service life and net salvage selections:

<u>Account</u>	<u>Account Name</u>	<u>Mr. Spanos' Recommended Rate (Rebuttal)</u>	<u>Staff's Recommended Rate</u>
376100	Steel Mains	2.26%	2.27%
379000	City Meas & Reg Station Equipment	2.66%	2.67%
380100	Steel Services	4.59%	4.67%
381000	Meters	3.54%	3.57%
385000	Comm & Ind Meas & Reg Eqpt	2.68%	2.67%
390200	Structures and Improvements	2.38%	2.50%
397000	Communication Equipment	5.86%	5.85%
397100	Communication Equipment	5.02%	5.01%

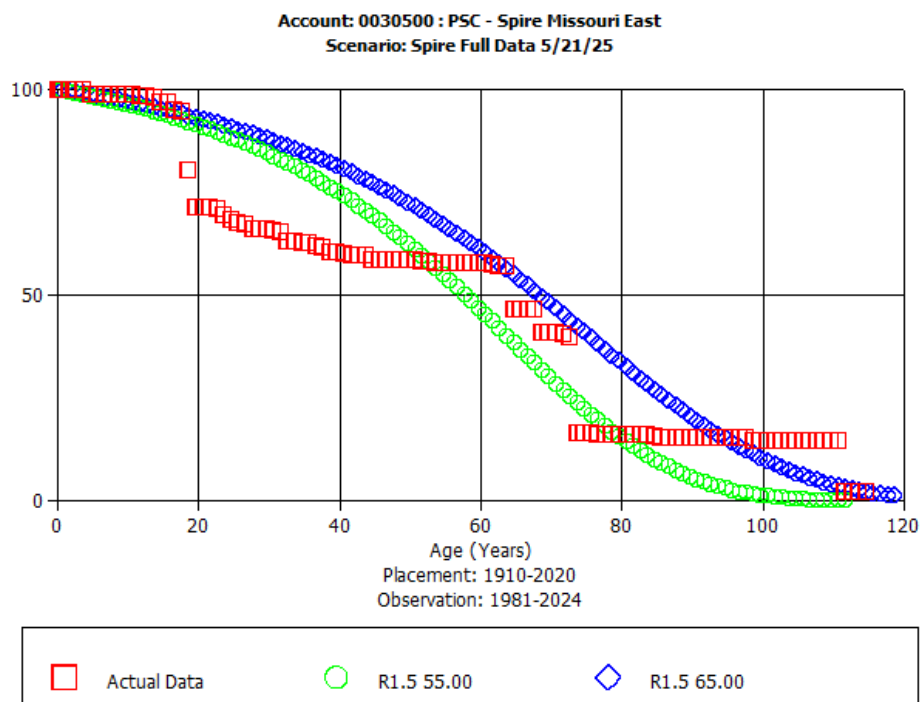
Q. Why does Staff continue to disagree with Mr. Spanos for these accounts?

A. For the accounts where Staff and Mr. Spanos agree on service life and net salvage selections but disagree on depreciation rates, Staff is unsure why the values differ since Staff and Mr. Spanos are using the same depreciation technique.

For accounts where Staff and Mr. Spanos disagree on service life and net salvage selections, the reasoning varies depending on the account.

Q. Why does Staff disagree with Mr. Spanos on the rate for account 305 (Structures and Improvements)?

A. For account 305 (Structures and Improvements), Mr. Spanos recommended a 55-year life (green) while Staff recommended a 65-year life (blue) which aligns with recommended rates in the past. The majority of the assets contained in this account are assets such as flooring, landscaping, plumbing, roofing and HVAC equipment. No factors such as changes in technology, services provided, or capital budgets have been indicated for this account, therefore Staff is relying on the stability in life and retirement dispersion to continue, as NARUC states, "unless there is some reason to expect otherwise, stability in life or retirement dispersion can be expected to continue, at least in the near term".⁴ Staff does not believe that historical analysis should be the only factor used in determining reasonable rates but in the absence of any other indications, it can be a reasonable factor in determining what the future life of the account may be. The historical analysis continues to reasonably support a 65-year life as shown below.



⁴ National Association of Regulatory Utility Commissioners, Public Utility Depreciation Practices, 1996, p. 126.

1 Q. Why does Staff disagree with Mr. Spanos on the rate for account 353 (Lines)?

2 A. For account 353 (Lines), Spire Missouri is recommending a service life of
3 70 years (green) while Staff is recommending a service life of 80 years (blue). Mr. Spanos
4 provided his reasoning in a data request response:

5 The selection of a 70-year life for this account was based on a
6 combination of statistical analysis and informed judgment based on
7 Company and industry expectations for the assets. The industry average
8 service life for this account is 50-55 years, which is much shorter than
9 the proposed 70-year life. The statistical data is strongly supported by
10 the 50 years of the life table and the expectation of the entire life cycle
11 which would have a maximum life 115 years is reasonable based on
12 Spire's plans for Account 353.00, Lines.⁵

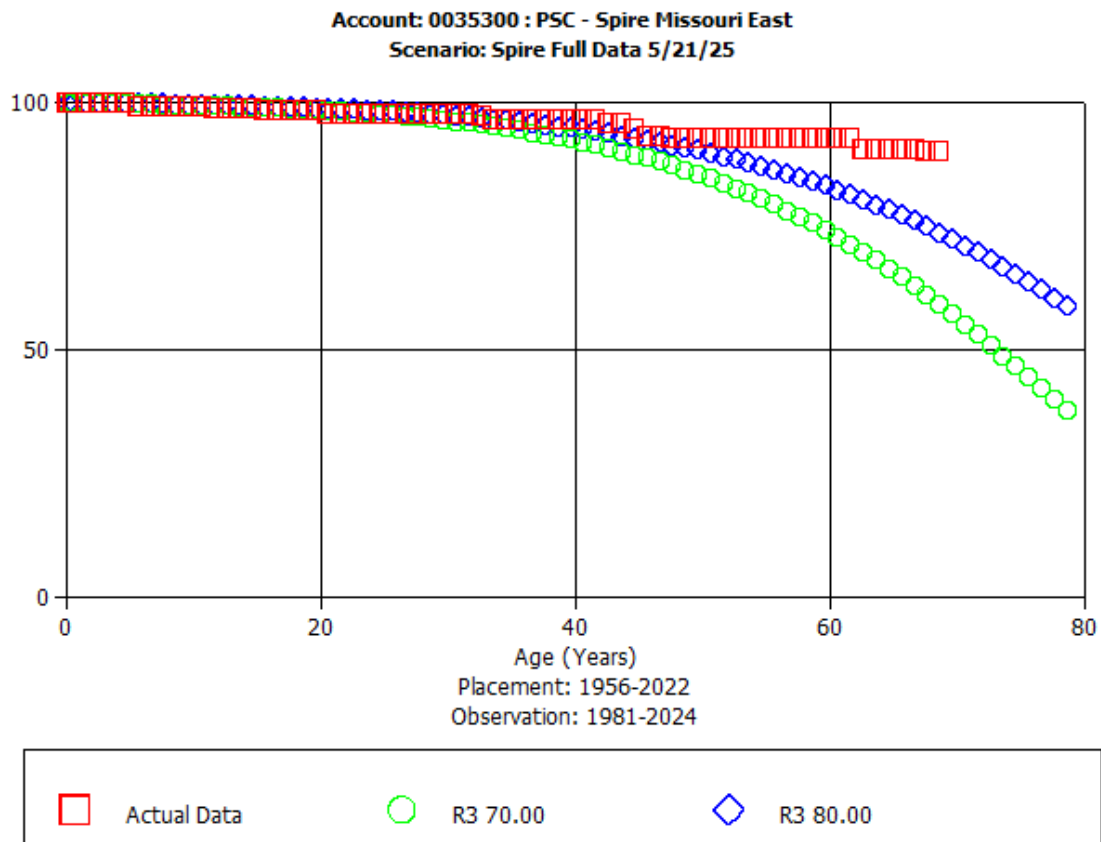
13 Enough time has not elapsed, nor data collected, to perform a useful statistical analysis
14 of this account. Mr. Spanos stated in rebuttal testimony that "service life estimates used for
15 these assets by other gas utility companies are typically around 50 years and most often range
16 from about 40 to 60 years. An average of 80 years is well beyond this range, and when
17 considered the overall life cycle for all assets within the account, Staff's estimate is even less
18 practical"⁶ but the 80-year life was Mr. Spanos' own recommendation from the 2021 rate case⁷
19 and a sufficient amount of time has not passed since the last case to make any alternative
20 recommendations that are based on statistical analysis. He also stated that "The Company's
21 expectation for the service life of these assets is less than 80 years"⁸ but he does not provide
22 any specific reasoning as to why that is Spire Missouri's expectation. For these reasons, Staff
23 continues to argue that an 80-year life is reasonable for this account.

⁵ Spire Missouri response to Staff Data Request No. 0324.

⁶ Mr. Spanos Rebuttal Testimony, Page 4, Lines 18-22.

⁷ GR-2021-0108.

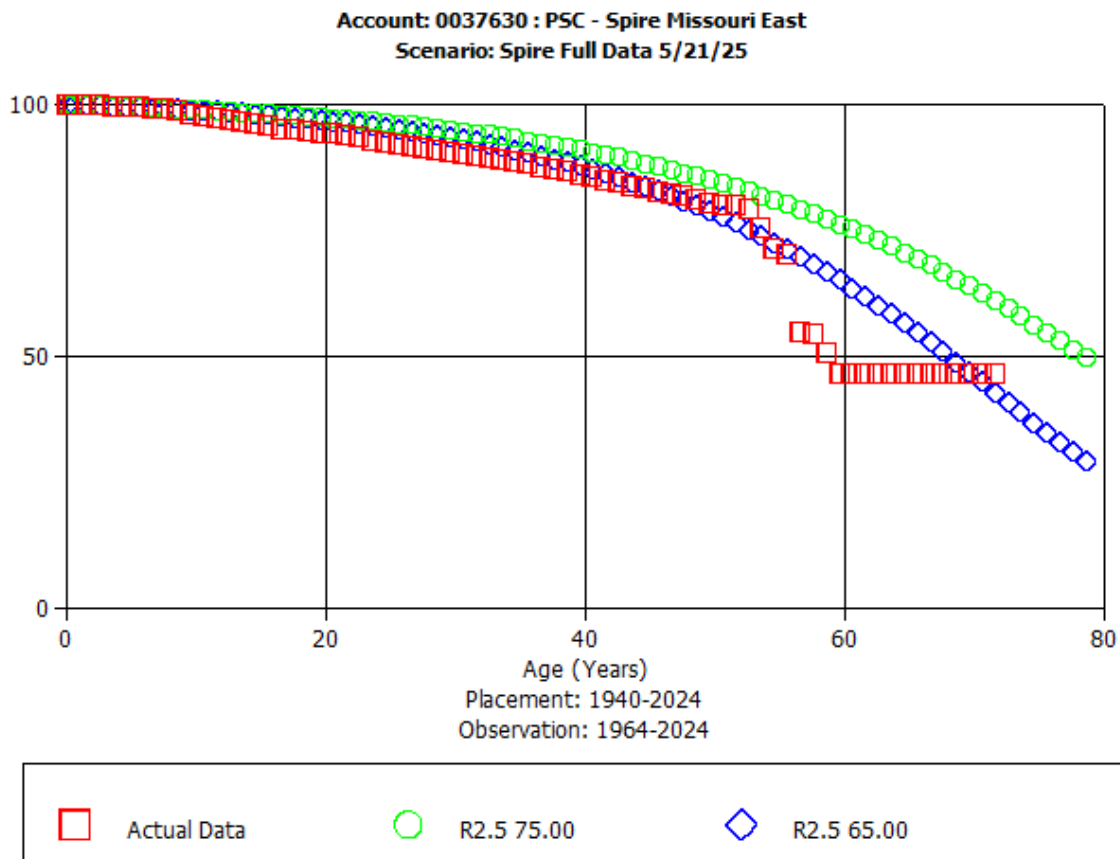
⁸ Mr. Spanos Rebuttal Testimony, Page 4, Lines 22-23.



Q. Why does Staff disagree with Mr. Spanos on the rate for account 376.3 (Plastic Mains)?

A. Mr. Spanos' updated service life for account 376.3 (Plastic Mains) is 65 years (blue) but Staff still holds the position that a 75-year life (green) is more reasonable. The 65-year life curve appears to fit the data closer using the selected placement and observation bands, but the selection of service lives should not be solely based on the historical analysis of data. In 2021, the Commission found that plastic mains should remain at 75 years since this was the lifespan previously established in the 2012 and 2016 depreciation studies. Additionally, Spire Missouri witnesses testified in prior cases that "the useful life of plastic mains would exceed

that of cast iron and unprotected steel mains.”⁹ Mr. Spanos and Staff both agree, in the current case, that a life of 65 years for cast iron mains (accounts 376.21 and 376.22) and 75 years for steel mains (account 376.1) is reasonable. Therefore, Staff’s selection of a 75-year life is reasonable for the plastic mains account.



Corrections to Depreciation Schedule

Q. What corrections did you make to your recommended depreciation rates?

⁹ GR-2021-0108, Report and Order, Page 50, #164.

1 A. I revised the rates for the General Plant Accounts, which are using General Plant
2 Amortization, to be composite rates so that the vintages outside of the amortization period,
3 which have been fully accrued, do not accumulate further depreciation which resulted in lower
4 depreciation rates for those accounts.

5 **Conclusion**

6 Q. In conclusion, what are Staff's recommendations?

7 A. Staff is recommending the use of the depreciation rates prepared by Staff
8 attached as Schedule MB-s2.

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

10 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 MALACHI BOWMAN

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MALACHI BOWMAN and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Surrebuttal Testimony of Malachi Bowman*; and that the same is true and correct according to his best knowledge and belief.

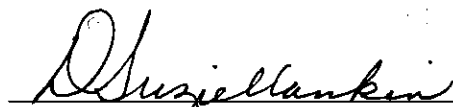
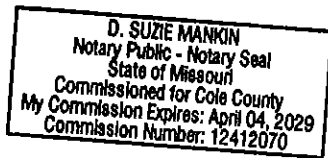
Further the Affiant sayeth not.



MALACHI BOWMAN

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

Account	Account Name	Spanos Direct Rates			Spanos Rebuttal Rates			Staff Surrebuttal Rates		
		Curve	Net Salvage	Rate	Curve	Net Salvage	Rate	Curve	Net Salvage	Rate
Production Plant										
305000	Structures and Improvements	55-R1.5	-5.00%	1.91%	55-R1.5	-5.00%	1.91%	R2-65	-15.00%	1.77%
307000	Other Power Equipment	50-R4	-5.00%	2.10%	50-R4	-5.00%	2.10%	R4-50	-5.00%	2.10%
311000	Propane Equipment	30-R1	-5.00%	0.00%	30-R1	-5.00%	0.00%	R1-30	-5.00%	2.62%
311100	Propane Stg Cavern	75-R4	-5.00%	0.00%	75-R4	-5.00%	0.00%	R4-75	-5.00%	1.40%
Underground Gas Storage										
350200	Rights of Way	80-R4	0.00%	1.25%	80-R4	0.00%	1.25%	R4-80	0.00%	1.25%
351200	Compressor Station Structure	50-R1	-10.00%	2.20%	50-R1.5	-10.00%	2.20%	R1-50	-10.00%	2.20%
351400	Other Structures	50-R1	-10.00%	2.20%	50-R1.5	-10.00%	2.20%	R1-50	-10.00%	2.20%
352000	Wells	75-R3	-20.00%	1.60%	75-R3	-20.00%	1.60%	R3-75	-20.00%	1.60%
352100	Storage Leaseholds	90-R3	0.00%	1.11%	90-R3	0.00%	1.11%	R3-90	0.00%	1.11%
352200	Reservoirs	90-S2.5	0.00%	1.11%	90-S2.5	0.00%	1.11%	S2.5-90	0.00%	1.11%
352300	Non-Recoverable Gas	90-R4	0.00%	1.11%	90-R4	0.00%	1.11%	R4-90	0.00%	1.11%
352400	Wells - Oil & Vent Gas	55-R2	-20.00%	2.18%	55-R2	-20.00%	2.18%	R2-55	-20.00%	2.18%
353000	Lines	70-R3	-25.00%	1.79%	70-R3	-25.00%	1.79%	R3-80	-25.00%	1.56%
354000	Compressor Station Equipment	55-R3	-10.00%	2.00%	55-R3	-10.00%	2.00%	R3-55	-10.00%	2.00%
355000	Meas. & Reg. Equipment	55-R2.5	-10.00%	2.00%	55-R2.5	-10.00%	2.00%	R2.5-55	-10.00%	2.00%
356000	Purification Equipment	50-S0.5	-15.00%	2.30%	50-S0.5	-15.00%	2.30%	S0.5-50	-15.00%	2.30%
Transmission Plant										
357000	Other Equipment	30-L2	-5.00%	3.50%	30-L2	-5.00%	3.50%	L2-30	-5.00%	3.50%
371700	Other Equipment	40-S2	-5.00%	2.63%	40-S2	-5.00%	2.63%	40-S2	-5.00%	2.63%
Distribution Plant										
374200	Land Rights	80-R4	0.00%	1.25%	80-R4	0.00%	1.25%	R4-80	0.00%	1.25%
375000	Structures and Improvements	50-S0	-10.00%	2.20%	50-S0	-10.00%	2.20%	S0-50	-10.00%	2.20%
376100	Steel Mains	70-R1.5	-70.00%	2.43%	75-R2	-70.00%	2.26%	75-R2	-70.00%	2.27%
376210	Cast Iron Mains - East	65-S0.5	-150.00%	19.07%	65-R2.5	-150.00%	19.05%	65-R2.5	-150.00%	19.05%
376220	Cast Iron Mains - West	65-S0.5	-150.00%	11.28%	65-R2.5	-150.00%	11.17%	65-R2.5	-150.00%	11.17%
376300	Plastic Mains	60-R1	-50.00%	2.51%	65-R2.5	-50.00%	2.31%	R2.5-75	-50.00%	2.00%
378000	Meas & Reg Station Equipment	35-L0.5	-40.00%	4.00%	40-L0.5	-40.00%	3.50%	40-L0.5	-40.00%	3.50%
379000	City Meas & Reg Station Equipment	40-S0.5	-20.00%	3.00%	45-S0.5	-20.00%	2.66%	45-S0.5	-20.00%	2.67%
380100	Steel Services	39-O1	-110.00%	5.28%	45-R0.5	-110.00%	4.59%	45-R0.5	-110.00%	4.67%
380200	Plastic & Copper Services	40-R1	-80.00%	4.50%	45-R1.5	-80.00%	4.00%	45-R1.5	-80.00%	4.00%

381000	Meters	26-R1	0.00%	3.80%	28-R1	0.00%	3.54%	28-R1	0.00%	3.57%
381100	Ultrasonic Meters	20-S3	0.00%	5.00%	20-S3	0.00%	5.00%	S3-20	0.00%	5.00%
382000	Meter Installations - West	60-R2	-2.00%	1.70%	60-R2	-2.00%	1.70%	R2-60	-2.00%	1.70%
382100	Ultrasonic Meter Installation	20-S2	0.00%	5.00%	20-S2	0.00%	5.00%	S2.5-20	0.00%	5.00%
383000	House Regulators	50-S2.5	0.00%	2.00%	55-S2.5	0.00%	1.82%	R3-55	0.00%	1.82%
385000	Comm & Ind Meas & Reg Eqpt	37-R1	-15.00%	3.10%	43-R1.5	-15.00%	2.68%	43-R1.5	-15.00%	2.67%
386000	Other Prop-Cust Premises	15-L3	0.00%	0.00%	15-L3	0.00%	0.00%	L3-15	0.00%	0.00%
387000	Other Equipment	50-R2.5	-10.00%	2.20%	50-R2.5	-10.00%	2.20%	R1.5-50	-10.00%	2.20%
General Plant										
390200	Structures and Improvements	40-S0.5	0.00%	2.38%	40-S0.5	0.00%	2.38%	S0.5-40	0.00%	2.50%
*391000	Office Furniture & Equipment	20-SQ	0.00%	4.81%	20-SQ	0.00%	4.81%	SQ-20	0.00%	4.81%
*391100	Data Processing Systems	5-SQ	0.00%	11.37%	5-SQ	0.00%	11.37%	SQ-5	0.00%	11.37%
*391200	Mechanical Office Equipment	15-SQ	0.00%	6.67%	15-SQ	0.00%	6.67%	SQ-15	0.00%	6.67%
*391300	Data Processing Software	10-SQ	0.00%	9.87%	10-SQ	0.00%	9.87%	SQ-10	0.00%	9.87%
*391950	Enterprise Software	10-SQ	0.00%	5.71%	10-SQ	0.00%	5.71%	SQ-10	0.00%	5.71%
*391960	Enterprise Hardware	10-SQ	0.00%	10.00%	10-SQ	0.00%	10.00%	SQ-10	0.00%	10.00%
392100	Transportation Eqpt - Cars	7-L2.5	20.00%	11.43%	7-L2.5	20.00%	11.43%	L2.5-7	20.00%	11.43%
392200	Transportation Eqpt-Trucks	11-L3	20.00%	7.27%	11-L3	20.00%	7.27%	S2-11	20.00%	7.27%
*393000	Stores Equipment	30-SQ	0.00%	2.25%	30-SQ	0.00%	2.25%	SQ-30	0.00%	2.25%
*394000	Tools, Shop & Garage Equipment	25-SQ	0.00%	3.63%	25-SQ	0.00%	3.63%	SQ-25	0.00%	3.63%
*395000	Laboratory Equipment	20-SQ	0.00%	3.47%	20-SQ	0.00%	3.47%	SQ-20	0.00%	3.47%
396000	Power Operated Equipment	13-L2.5	20.00%	6.15%	13-L2.5	20.00%	6.15%	L2.5-13	20.00%	6.15%
*397000	Communication Equipment	15-SQ	0.00%	5.86%	15-SQ	0.00%	5.86%	SQ-15	0.00%	5.85%
*397100	Communication Equipment	15-SQ	0.00%	5.02%	15-SQ	0.00%	5.02%	SQ-15	0.00%	5.01%
*397200	Communication Equipment	7.5-SQ	0.00%	0.00%	7.5-SQ	0.00%	0.00%	SQ-7.5	0.00%	0.00%
*398000	Miscellaneous Equipment	20-SQ	0.00%	4.65%	20-SQ	0.00%	4.65%	SQ-20	0.00%	4.65%

*Account that uses General Plant Amortization

Spire Missouri (Gas)

Schedule of Depreciation Rates – Settlement Purposes Only					
GR-2025-0107					
	<u>Depreciable Plant</u>	<u>Selected Curves</u>	<u>Average Service Life</u>	<u>Net Salvage</u>	<u>Depreciation Rate</u>
	Production Plant				
305	Structures and Improvements	R2-65	65.00	-15.00%	1.77%
307	Other Power Equipment	R4-50	50.00	-5.00%	2.10%
**311	Propane Equipment	R1-30	30.00	-5.00%	2.62%
**311.1	Propane Stg Cavern	R4-75	75.00	-5.00%	1.40%
	Underground Gas Storage				
350.2	Rights of Way	R4-80	80.00	0.00%	1.25%
351.2	Compressor Station Structure	R1-50	50.00	-10.00%	2.20%
351.4	Other Structures	R1-50	50.00	-10.00%	2.20%
352	Wells	R2-80	80.00	-20.00%	1.60%
352.1	Storage Leaseholds	R3-90	90.00	0.00%	1.11%
352.2	Reservoirs	S2.5-90	90.00	0.00%	1.11%
352.3	Non-Recoverable Gas	R4-90	90.00	0.00%	1.11%
352.4	Wells - Oil & Vent Gas	R2-55	55.00	-20.00%	2.18%
353	Lines	R3-80	80.00	-25.00%	1.56%
354	Compressor Station Equipment	R3-55	55.00	-10.00%	2.00%
355	Meas. & Reg. Equipment	R2.5-55	55.00	-10.00%	2.00%
356	Purification Equipment	S0.5-50	50.00	-15.00%	2.30%
357	Other Equipment	L2-30	30.00	-5.00%	3.50%
	Transmission Plant				
*367	Mains - Transmission	Not Analyzed	80.00	15.00%	2.00%
371.7	Other Equipment	40-S2	40.00	-5.00%	2.63%
	Distribution Plant				
374.2	Land Rights	R4-75	75.00	0.00%	1.25%
375	Structures and Improvements	S0-50	50.00	-10.00%	2.20%
*375.1	Structures and Improvements - Meas & Reg	Not Analyzed	50.00	-20.00%	2.40%
*375.2	Structures and Improvements - Svc Centers	Not Analyzed	50.00	-20.00%	2.40%
*375.3	Structures and Improvements - Garages	Not Analyzed	50.00	-20.00%	2.40%
*375.41	Structures and Improvements - Leased Property	Not Analyzed	50.00	-20.00%	2.40%
*375.7	Structures and Improvements - MN	Not Analyzed	50.00	-20.00%	2.40%
376.1	Steel Mains	75-R2	75.00	-70.00%	2.27%
376.21	Cast Iron Mains - East	65-R2.5	65.00	-150.00%	19.05%
376.22	Cast Iron Mains - West	65-R2.5	65.00	-150.00%	11.17%
376.3	Plastic Mains	R2.5-75	75.00	-50.00%	2.00%

	<u>Depreciable Plant</u>	<u>Selected Curves</u>	<u>Average Service Life</u>	<u>Net Salvage</u>	<u>Depreciation Rate</u>
cont'd Distribution Plant					
378	Meas & Reg Station Equipment	40-L0.5	40.00	-40.00%	3.50%
379	City Meas & Reg Station Equipment	45-S0.5	45.00	-20.00%	2.67%
380.1	Steel Services	45-R0.5	45.00	-110.00%	4.67%
380.2	Plastic & Copper Services	45-R1.5	45.00	-80.00%	4.00%
***381	Meters	28-R1	28.00	0.00%	3.57%
381.1	Ultrasonic Meters	S3-20	20.00	0.00%	5.00%
382	Meter Installations - West	R2-60	60.00	0.48%	1.70%
382.1	Ultrasonic Meter Installation	S2.5-20	20.00	0.00%	5.00%
383	House Regulators	R3-50	50.00	0.00%	1.82%
385	Comm & Ind Meas & Reg Eqpt	43-R1.5	43.00	-15.00%	2.56%
386	Other Prop-Cust Premises	L3-15	15.00	0.00%	0.00%
387	Other Equipment	R1.5-50	50.00	-10.00%	2.20%
General Plant					
390.2	Structures and Improvements	S0.5-40	40.00	0.00%	2.50%
390.7	Structures - Gen Plant - Monat	Not Analyzed	40.00	0.00%	2.50%
391	Office Furniture & Equipment	SQ-20	20.00	0.00%	4.81%
391.1	Data Processing Systems	SQ-5	5.00	0.00%	11.37%
391.2	Mechanical Office Equipment	SQ-15	15.00	0.00%	6.67%
391.3	Data Processing Software	SQ-10	10.00	0.00%	9.87%
*391.4	Data processing systems	Not Analyzed	5.00	0.00%	9.89%
391.95	Enterprise Software	SQ-10	10.00	0.00%	5.71%
391.96	Enterprise Hardware	SQ-10	10.00	0.00%	10.00%
392.1	Transportation Eqpt - Cars	L2-8	8.00	20.00%	11.43%
392.2	Transportation Eqpt-Trucks	S2-11	11.00	20.00%	7.27%
393	Stores Equipment	SQ-30	30.00	0.00%	2.25%
394	Tools, Shop & Garage Equipment	SQ-25	25.00	0.00%	3.63%
*394.5	Equipment-CNG Fuel Stations	Not Analyzed	0.00%	0.00%	3.62%
395	Laboratory Equipment	SQ-20	20.00	0.00%	3.47%
396	Power Operated Equipment	L2.5-13	13.00	20.00%	6.15%
397	Communication Equipment	SQ-15	15.00	0.00%	5.85%
397.1	Communication Equipment - ERT	SQ-15	15.00	0.00%	5.01%
397.2	Communication Equipment - AMR	SQ-7.5	7.50	0.00%	0.00%
398	Miscellaneous Equipment	SQ-20	20.00	0.00%	4.65%

(*) Denotes an account which was not studied by Ameren Missouri so Staff is recommending currently ordered rates

(**) Currently ordered rates were recommended but Spire indicates that retirement will occur by May 31, 2025. If so, Staff will update its recommended depreciation rates to 0%.

(***) Account 381 includes both Meter purchases and Meter Installation costs for Spire Missouri East