

*Exhibit No.:*  
*Issue(s):* *Energy Efficiency*  
*Witness:* *Antonija Nieto*  
*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**

**FINANCIAL & BUSINESS ANALYSIS DIVISION**

**AUDITING DEPARTMENT**

**SURREBUTTAL / CROSS-SURREBUTTAL TESTIMONY**

**OF**

**ANTONIJA NIETO**

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

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

*Jefferson City, Missouri*  
*June 2025*

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1 for 1) the promotion of new business and 2) imprudent administration expenses deferred into  
2 the regulatory asset.<sup>1</sup>

3 Q. What is Staff's response to Ms. Schaben's analysis?

4 A. Staff appreciates Ms. Schaben's observations regarding the energy efficiency  
5 regulatory asset and shares her concern on the recovery of imprudent costs. Staff has submitted  
6 a Data Request for a sample of invoices to Spire Missouri to obtain underlying bills and  
7 supporting documentation for the expenditures charged to the energy efficiency regulatory  
8 asset. Included in the sample requested are transactions that Ms. Schaben identified as lacking  
9 complete documentation, as well as a broader sample to ensure comprehensive review.

10 Q. How will Staff utilize the requested invoices and documentation in its review?

11 A. Upon receipt of the requested documentation, Staff will conduct an examination  
12 of transactions. This will include, but not be limited to, verifying the nature of the expense and  
13 evaluating whether the expenditures provide a direct benefit to ratepayers and contribute to  
14 energy efficiency goals. Staff's goal is to ensure that only necessary and supported costs are  
15 ultimately included in rates, aligning with its responsibility to protect the interests of Missouri  
16 ratepayers. In its true-up direct testimony, Staff will provide a recommendation regarding the  
17 appropriate amount to include in the energy efficiency regulatory asset as of the true-up date.

18 Q. If any portion of the \$2.1 million alleged to be inappropriately charged to the  
19 energy efficiency regulatory asset is determined to be recoverable, should Spire Missouri  
20 recover these expenses in a different manner?

21 A. Yes, to the extent the expenses were incurred in the test year and are determined  
22 to be appropriate for recovery from ratepayers, they should be included as a period cost similar

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<sup>1</sup> Rebuttal Testimony of Angela Schaben, Page 8, lines 11-15.

1 to any other cost of service. To the extent the Commission finds these costs to be imprudently  
2 incurred, the costs would be removed from the energy efficiency regulatory asset and not  
3 included in the cost of service.

4 Q. Does this conclude your surrebuttal testimony?

5 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 ANTONIJA NIETO**

STATE OF MISSOURI )  
 )  
COUNTY OF Jackson )      ss.

**COMES NOW ANTONIJA NIETO** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal Testimony of Antonija Nieto*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
\_\_\_\_\_  
**ANTONIJA NIETO**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Jackson, State of Missouri, at my office in Kansas City, on this 25<sup>th</sup> day of June 2025.

  
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Notary Public

