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

1		SURREBUTTAL TESTIMONY OF
2		ANTONIJA NIETO
3 4		SPIRE MISSOURI INC., d/b/a Spire
5		CASE NO. GR-2025-0107
6	Q.	Please state your name and business address.
7	A.	My name is Antonija Nieto and my business address is 615 East 13 th Street,
8	Kansas City, MO 64106.	
9	Q.	By whom are you employed and in what capacity?
10	A.	I am employed by the Missouri Public Service Commission ("Commission" or
11	"PSC") as a Lead Senior Utility Regulatory Auditor.	
12	Q.	Are you the same Antonija Nieto who filed Direct Testimony on April 23, 2025,
13	in this case?	
14	A.	Yes, I am.
15	Q.	What is the purpose of your surrebuttal testimony?
16	A.	The purpose of my surrebuttal testimony is to respond to the Office of the Public
17	Counsel ("OPC") Rebuttal Testimony of Angela Schaben regarding Spire Missouri Inc.'s, d/b/a	
18	Spire ("Spire Missouri").	
19	ENERGY EFFICIENCY	
20	Q.	What does Ms. Schaben recommend in her rebuttal testimony?
21	A.	Ms. Schaben's rebuttal testimony supports a disallowance of \$2.1 million to
22	Spire's Miss	ouri energy efficiency asset. This disallowance is related to costs incurred
22	Spire's Miss	ouri energy efficiency asset. This disallowance is related to costs incl

- for 1) the promotion of new business and 2) imprudent administration expenses deferred into
 the regulatory asset.¹
 - Q. What is Staff's response to Ms. Schaben's analysis?
 - A. Staff appreciates Ms. Schaben's observations regarding the energy efficiency regulatory asset and shares her concern on the recovery of imprudent costs. Staff has submitted a Data Request for a sample of invoices to Spire Missouri to obtain underlying bills and supporting documentation for the expenditures charged to the energy efficiency regulatory asset. Included in the sample requested are transactions that Ms. Schaben identified as lacking complete documentation, as well as a broader sample to ensure comprehensive review.
 - Q. How will Staff utilize the requested invoices and documentation in its review?
 - A. Upon receipt of the requested documentation, Staff will conduct an examination of transactions. This will include, but not be limited to, verifying the nature of the expense and evaluating whether the expenditures provide a direct benefit to ratepayers and contribute to energy efficiency goals. Staff's goal is to ensure that only necessary and supported costs are ultimately included in rates, aligning with its responsibility to protect the interests of Missouri ratepayers. In its true-up direct testimony, Staff will provide a recommendation regarding the appropriate amount to include in the energy efficiency regulatory asset as of the true-up date.
 - Q. If any portion of the \$2.1 million alleged to be inappropriately charged to the energy efficiency regulatory asset is determined to be recoverable, should Spire Missouri recover these expenses in a different manner?
 - A. Yes, to the extent the expenses were incurred in the test year and are determined to be appropriate for recovery from ratepayers, they should be included as a period cost similar

¹ Rebuttal Testimony of Angela Schaben, Page 8, lines 11-15.

Surrebuttal Testimony Antonija Nieto

- 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.
 - Q. Does this conclude your surrebuttal testimony?
- 5 A. Yes, it does.

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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 <u>fackson</u>) 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. ANT	ONIJA NIETO			
JURAT				
Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the				
County of <u>fackson</u> , State of Missouri, at my office in <u>kansas</u> , on this <u>25+k</u> day of June 2025.				
this 25% day of June 2025.	U			
Notar	ry Public			
B. L. STIGO	SER .			

NOTARY PUBLIC - NOTARY SEAL STATE OF MISSOURI MY COMMISSION EXPIRES JANUARY 2, 2028 JACKSON COUNTY COMMISSION #24332661