

*Exhibit No.:*  
*Issue(s):* *Class Cost of Service  
Study; Rate Design;  
Miscellaneous Service  
Charges*  
*Witness:* *Keri Roth*  
*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**

**KERI ROTH**

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

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

*Jefferson City, Missouri  
June 2025*

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KERI ROTH  
SPIRE MISSOURI INC.,  
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1 **SURREBUTTAL / CROSS-SURREBUTTAL**

2 **TESTIMONY OF**

3 **KERI ROTH**

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 Keri Roth. My business address is 200 Madison Street,  
9 P.O. Box 360, Jefferson City, Missouri 65102.

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

11 A. I am employed by the Missouri Public Service Commission (“Commission”)  
12 as a Lead Senior Utility Regulatory Auditor.

13 Q. Are you the same Keri Roth who filed direct testimony on May 7, 2025,  
14 and rebuttal testimony on May 30, 2025, in this case?

15 A. Yes, I am.

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

17 A. The purpose of my surrebuttal testimony is to respond to Spire Missouri Inc.,  
18 d/b/a Spire (“Spire Missouri”) witnesses Timothy S. Lyons regarding the Missouri Public  
19 Service Commission Staff’s (“Staff”) Class Cost of Service (“CCOS”) study and rate design  
20 proposal and Julie Johnson regarding miscellaneous service charges. Additionally, I will  
21 respond to Missouri Industrial Energy Consumers (“MIEC”) witness Jessica A. York regarding  
22 Staff’s CCOS study and rate design proposal. Lastly, I will provide an updated CCOS study  
23 and rate design proposal based on errors described in my rebuttal testimony and Staff’s updated  
24 revenue requirement calculation.

1 **CLASS COST OF SERVICE STUDY**

2 **Staff Response to Spire Missouri Witness Timothy S. Lyons**

3 Q. Spire Missouri witness Timothy S. Lyons states in rebuttal testimony that one  
4 of the significant differences between Spire Missouri and Staff's CCOS is that Staff's CCOS  
5 classifies distribution mains as 100.00 percent demand.<sup>1</sup> Is this an error in Staff's CCOS?

6 A. Yes. As described in my rebuttal testimony, Staff attempted to utilize the  
7 Average and Excess method to calculate the Distribution Mains allocator as Staff has used in  
8 prior cases. During this process, Staff erroneously utilized incorrect data for coincident peak  
9 ("CP") and non-coincident peak demand ("NCP"). However, when attempting to correct errors,  
10 Staff discovered that Spire Missouri did not fully provide data for each rate class as requested.<sup>2</sup>  
11 Due to data not being fully provided, Staff has utilized the distribution mains allocators  
12 calculated by former Staff witness Robin Kliethermes in case number GR-2021-0108.

13 Q. Spire Missouri witness Timothy S. Lyons states in rebuttal testimony that Staff's  
14 allocator for Spire Missouri West's meters and regulators is based on Spire Missouri East  
15 factors.<sup>3</sup> Is this an error in Staff's CCOS study?

16 A. Yes. This error has been corrected.

17 Q. Spire Missouri witness Timothy S. Lyons states in rebuttal testimony that  
18 Spire Missouri agrees in part with Staff's proposal to increase customer and delivery charges  
19 on a uniform percentage increase in class revenues.<sup>4</sup> Did Staff propose an equal percentage  
20 increase in class revenues?

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<sup>1</sup> Spire Missouri Witness Timothy S. Lyons, rebuttal testimony, page 7, line 18.

<sup>2</sup> Staff Witness Keri Roth, rebuttal testimony, page 6, lines 12 – 16.

<sup>3</sup> Spire Missouri Witness Timothy S. Lyons, rebuttal testimony, page 11, lines 21 – 22.

<sup>4</sup> Spire Missouri Witness Timothy S. Lyons, rebuttal testimony, page 12, lines 11 – 15.

1           A.     No. As shown in the tables on page 8 of my direct testimony, revenue increases  
2 varied between 18.8% and 50.1% for Spire Missouri East and varied between 13.3% and 44.4%  
3 for Spire Missouri West. However, these increases have changed with Staff's updated CCOS  
4 study and will be discussed further below.

5                   **Staff Response to MIEC Witness Jessica A. York**

6           Q.     MIEC witness Jessica A. York discusses several errors she identified with  
7 Staff's CCOS study.<sup>5</sup> Did you address the errors identified by witness York in your rebuttal  
8 testimony?

9           A.     Yes.<sup>6</sup> However, Staff did not make changes to the usage for Unmetered Gas  
10 Light Service, as Staff does not believe it is incorrect.

11          Q.     Will Staff file an updated CCOS study correcting the errors identified with this  
12 surrebuttal testimony?

13          A.     Yes. However, as discussed previously, Spire Missouri did not provide CP and  
14 NCP data for all rate classes in its data request response; therefore, Staff is only able to correct  
15 errors for which accurate data has been provided.

16          Q.     MIEC witness Jessica A. York states in rebuttal testimony that Staff has  
17 incorrectly allocated costs of underground storage and gas inventory to all customer classes for  
18 Spire Missouri East.<sup>7</sup> Does Staff agree with Ms. York's statement that costs of underground  
19 storage have been incorrectly allocated?

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<sup>5</sup> MIEC Witness Jessica A. York, rebuttal testimony, page 3, lines 14 – 26 and page 4, lines 1 – 18.

<sup>6</sup> Staff Witness Keri Roth, rebuttal testimony, page 6, lines 5 – 16.

<sup>7</sup> MIEC Witness Jessica A. York, rebuttal testimony, page 5, lines 15 – 19.

1           A.     No. Ms. York does not believe that underground storage costs should be  
2 allocated to Transportation Service because these customers only purchase delivery service  
3 through Spire.<sup>8</sup> Staff has made the opposite argument in previous cases, and continues to  
4 disagree with Ms. York's statement in this case. Transportation customers do benefit from  
5 Spire Missouri East's underground storage costs and gas inventory. In case number  
6 GR-2021-0108, former Staff witness Robin Kliethermes wrote in surrebuttal testimony:

7                     Transportation customers are customers who choose to purchase their gas  
8 requirements from a supplier other than Spire, but utilize Spire's distribution  
9 system to transport the gas to the customer's location. Spire's Transportation tariffs  
10 provide that the difference between the amount of gas delivered to the customer  
11 and the amount of gas used by the customer is balanced by the calendar month.  
12 Therefore, the Transportation customer has approximately a month to make up any  
13 imbalances that may occur in a day. For example, a Transportation customer may  
14 use more gas than nominated when the market price per Ccf is higher and use less  
15 gas than nominated on a day when the market price per Ccf is lower, making a zero  
16 net monthly balance. In this example, the customer is utilizing the Company's  
17 storage capabilities to lower its overall cost of gas for the month.<sup>9</sup>

18           **Staff's Updated CCOS Study**

19           Q.     Can you please describe the errors Staff has corrected in its updated  
20 CCOS study?

21           A.     Yes. The following is a summary of errors Staff has corrected in its updated  
22 CCOS study:

- 23           • Usage has been correctly summed for Large Volume Service and Transportation  
24           Service classes;
- 25           • Calculations for 'Max HDD usage' and 'Max HDD less transport' allocation  
26           factors have been corrected;

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<sup>8</sup> *Id.*

<sup>9</sup> Staff Witness Robin Kliethermes, Case No. GR-2021-0108, surrebuttal testimony, page 9, lines 8 – 15, and page 10, lines 1 – 2.

- 1 • The Distribution Mains allocator has been adjusted to reflect allocators used by
- 2 Staff in case number GR-2021-0108 due to data not being provided in full by
- 3 Spire Missouri;
- 4 • The Spire Missouri West Meters and Regulators allocator has been adjusted to
- 5 reflect data from Spire Missouri West, instead of Spire Missouri East;
- 6 • The updated CCOS has been adjusted to reflect any updates from Staff’s revenue
- 7 requirement calculation.

8 Q. What are the results of Staff’s updated CCOS?

9 A. The results of Staff’s updated CCOS are shown in the following tables for Spire  
 10 Missouri East:

<b>Spire Missouri East</b>			
<b>Customer Class</b>	<b>Total Revenue from Current Rates</b>	<b>Staff CCOS Revenue Requirement Allocation</b>	<b>% Change in Class Revenue Requirement</b>
Residential	\$ 323,619,711	\$ 50,466,912	15.6 %
Small General	\$ 38,757,306	\$ 19,596,387	50.6 %
Large General	\$ 29,647,381	\$ 9,596,559	32.4 %
Large Volume	\$ 817,979	\$52,505	6.4 %
Unmetered Gas Light	\$ 47,621	\$ 268,240	563.3 %
Transportation	\$ 13,815,976	\$ 1,059,811	7.7 %
General L.P. Gas	\$ 12,381	\$ 27,411	221.4 %
<b>Total</b>	<b>\$406,718,355</b>	<b>\$ 81,067,825</b>	

11  
 12 As shown in the table for Spire Missouri East, Staff’s results from its updated CCOS  
 13 continue to show significant increases for several customer classes. As previously explained in

1 my direct testimony, Staff has made revenue shifts amongst classes to avoid large changes in  
 2 current rates for some customer classes. Staff proposes the following revenue shifts:

<b>Spire Missouri East</b>			
<b>Customer Class</b>	<b>Staff CCOS Revenue Requirement Allocation</b>	<b>Staff Revenue Shift</b>	<b>% Change in Class Revenue Requirement</b>
Residential	\$ 50,466,912	\$ 12,285,000	19.4 %
Small General	\$ 19,596,387	\$ (8,000,000)	29.9 %
Large General	\$ 9,596,559	\$ (4,000,000)	18.9 %
Large Volume	\$52,505	\$ 0	6.4 %
Unmetered Gas Light	\$ 268,240	\$ (260,000)	17.3 %
Transportation	\$ 1,059,811	\$ 0	7.7 %
General L.P. Gas	\$ 27,411	\$ (25,000)	19.5 %
<b>Total</b>	<b>\$ 81,067,825</b>		

3 The results of Staff's updated CCOS are shown in the following tables for  
 4 Spire Missouri West:

<b>Spire Missouri West</b>			
<b>Customer Class</b>	<b>Total Revenue from Current Rates</b>	<b>Staff CCOS Revenue Requirement Allocation</b>	<b>% Change in Class Revenue Requirement</b>
Residential	\$ 252,492,878	\$ 38,259,790	15.2 %
Small General	\$ 28,138,029	\$ 7,813,325	27.8 %
Large General	\$ 17,544,943	\$ 8,171,971	46.6 %
Large Volume	\$ 1,057,932	\$ 8,552,032	808.4 %
Unmetered Gas Light	\$ 772	\$ 9,860	1,277.6 %
Transportation	\$ 2,124,976	\$ (6,769,801)	(318.6 %)
Intrastate Transportation	\$ 15,997,334	\$ 24,795,196	155.0 %
<b>Total</b>	<b>\$ 317,356,863</b>	<b>\$ 80,832,373</b>	

5 As shown in the table for Spire Missouri West, Staff's results from its updated CCOS  
 6 continue to show significant increases and decreases for several customer classes. Similar to



1 Spire East, Staff has made revenue shifts amongst classes to avoid large changes in current rates  
 2 for some customer classes. Staff proposes the following revenue shifts:

<b>Spire Missouri West</b>			
<b>Customer Class</b>	<b>Staff CCOS Revenue Requirement Allocation</b>	<b>Staff Revenue Shift</b>	<b>% Change in Class Revenue Requirement</b>
Residential	\$ 38,259,790	\$ 25,369,670	25.2 %
Small General	\$ 7,813,325	\$ (770,000)	25.0 %
Large General	\$ 8,171,971	\$ (3,800,000)	24.9 %
Large Volume	\$ 8,552,032	\$ (8,290,000)	24.8 %
Unmetered Gas Light	\$ 9,860	\$ (9,670)	24.6 %
Transportation	\$ (6,769,801)	\$ 8,300,000	72.0 %
Intrastate	\$ 24,795,196	\$ (20,800,000)	25.0 %
Transportation			
Total	\$ 80,832,373		

3 **RATE DESIGN**

4 **Staff Response to Spire Missouri Witness Timothy S. Lyons**

5 Q. Spire Missouri witness Timothy S. Lyons states in rebuttal testimony that  
 6 Spire Missouri opposes Staff's proposal to continue the inclining block rates structure in the  
 7 summer for the residential rate class.<sup>10</sup> Is Staff proposing to continue the inclining block rates  
 8 structure in the summer for the residential class?

9 A. Not necessarily. Staff has continued to include the rate in its calculated rate  
 10 design because Staff did not make any proposal to change Spire Missouri's existing rate  
 11 structure. However, as stated in my rebuttal testimony, Staff does not object to Spire Missouri's  
 12 proposal to remove the inclining block rate as customer usage has been relatively stable before

<sup>10</sup> Spire Missouri Witness Timothy S. Lyons, rebuttal testimony, page 12, lines 16 – 17.

1 and after the inclining block rate was implemented. Staff does not believe changing this portion  
2 of the rate design will have a negative effect on customers or Spire Missouri.<sup>11</sup>

3 **MISCELLANEOUS SERVICE CHARGES**

4 Q. Has Spire Missouri proposed any additional changes to its miscellaneous service  
5 charges?

6 A. Yes. In rebuttal testimony, Spire witness Julie Johnson stated that  
7 Spire Missouri intends to update its advanced meter opt-out monthly charge to be consistent  
8 with the recently enacted Senate Bill 4 legislation.<sup>12</sup>

9 Q. Is Staff opposed to this change?

10 A. No.

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

12 A. Yes, it does.

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<sup>11</sup> Staff Witness Keri Roth, rebuttal testimony, page 2 lines 18 – 20, and page 3, lines 1 – 3.

<sup>12</sup> Spire Missouri Witness Julie Johnson, rebuttal testimony, page 12, lines 1 – 5.

**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 )

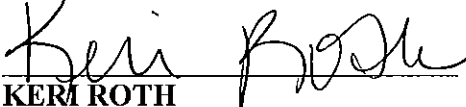
Case No. GR-2025-0107

**AFFIDAVIT OF KERI ROTH**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

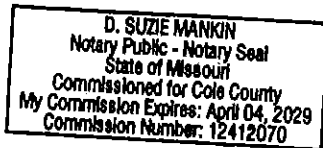
**COMES NOW KERI ROTH** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Surrebuttal / Cross-Surrebuttal Testimony of Keri Roth*; and that the same is true and correct according to her best knowledge and belief.

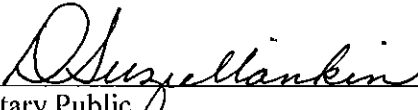
Further the Affiant sayeth not.

  
KERI ROTH

**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 27<sup>th</sup> day of June 2025.



  
Notary Public