

Exhibit No.:	
Issue(s):	Disconnection Practices Miscellaneous Charges Income Eligible Rate Program PGA/ACA Tariffs Rate Switching
Witness:	Julie Johnson
Type of Exhibit:	Surrebuttal Testimony
Sponsoring Party:	Spire Missouri Inc.
Case Nos.	GR-2025-0107
Date Prepared:	June 30, 2025

SPIRE MISSOURI INC.

CASE NO. GR-2025-0107

SURREBUTTAL TESTIMONY

OF

JULIE JOHNSON

JUNE 30, 2025

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1 **SURREBUTTAL TESTIMONY OF JULIE JOHNSON**

2 **I. INTRODUCTION**

3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A. My name is Julie Johnson, and my business address is 700 Market Street, St. Louis, MO
5 63101.

6 **Q. ARE YOU THE SAME JULIE JOHNSON THAT SUBMITTED DIRECT AND**
7 **REBUTTAL TESTIMONY IN THIS CASE?**

8 A. Yes, I submitted Direct and Rebuttal Testimony on behalf of Spire Missouri Inc. (“Spire
9 Missouri” or “Company”) in this rate case.

10 **Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?**

11 A. The purpose of my surrebuttal testimony is to respond to various issues, positions and
12 statements made in the rebuttal testimony of the Missouri Public Service Commission Staff
13 (“Staff”) and the Office of Public Counsel (“OPC”), which was filed with the Commission
14 on May 30, 2025. Specifically, I will provide surrebuttal testimony responding to the
15 following issues: disconnection practices, miscellaneous service charges, and Spire
16 Missouri’s Income Eligible Rate Program.

17 **Q. ARE YOU SPONSORING ANY SCHEDULES WITH YOUR SURREBUTTAL**
18 **TESTIMONY?**

19 A. No.

20 **II. DISCONNECTION PRACTICES**

21 **Q. OPC WITNESS MARKE STATES HE IS HESITANT TO SUPPORT**
22 **COMPLETELY PAUSING DISCONNECTIONS FOR NON-PAYMENT DURING**
23 **THE WINTER MONTHS, BUT AGREES THAT INTERNAL PARAMETERS**

1 **NEED TO BE PUT IN PLACE AS THE COLD AND HOT WEATHER RULES**
2 **DISCONNECTION MORATORIUM HAS BEEN EXTENDED FROM 24 HOURS**
3 **TO 72 HOURS PER THE RECENTLY PASSED SENATE BILL 4 (“SB 4”)**
4 **LEGISLATION. HOW DO YOU RESPOND?**

5 A. The Company agrees to changing its tariff sheets and internal processes to incorporate the
6 SB 4 changes related to the 72-hour disconnection moratorium for all disconnection types
7 except in cases of Atmospheric Corrosion Inspection (“ACI”) safety inspections and
8 Locked Meters Showing Consumption.

9 **Q. OPC WITNESS MARKE RECOMMENDS THAT OPC BE INCLUDED ON ALL**
10 **FUTURE QUARTERLY CUSTOMER EXPERIENCE MEETINGS WITH STAFF**
11 **AND THE COMPANY AND THAT THE COMPANY AGREE TO PROVIDE ANY**
12 **REPORTS, HANDOUTS, OR PRESENTATIONS AT LEAST 48 HOURS BEFORE**
13 **THE ACTUAL MEETING. HOW DO YOU RESPOND?**

14 A. The Company has no concerns with including OPC in quarterly meetings and will do its
15 best to provide reports, handouts, and presentations 48 hours in advance.

16 **III. MISCELLANEOUS CHARGES**

17 **Q. WHAT WAS STAFF’S RECOMMENDATION REGARDING MISCELLANEOUS**
18 **CHARGES?**

19 A. Staff witness Roth does not have concerns with Spire Missouri’s proposed tariff changes
20 that would remove certain charges and align all miscellaneous service charges to be the
21 same between both Spire Missouri East and Spire Missouri West service territories.
22 Additionally, Ms. Roth stated that the changes in fees proposed by Spire Missouri for meter
23 and service relocations reasonably cover the costs associated with the service listed. The

1 Company appreciates Staff's agreement with Spire Missouri's proposals regarding
2 miscellaneous charges.

3 **IV. SPIRE MISSOURI INCOME ELIGIBLE RATE PROGRAM**

4 **Q. OPC WITNESS MARKE STATES THAT OPC IS POSSIBLY IN SUPPORT OF**
5 **SPIRE MISSOURI'S NEW "KEEPING FAMILIES WARM" ARREARAGE**
6 **ASSISTANCE PROGRAM , BUT THE OPC IS NOT ENTIRELY SURE HOW THE**
7 **PROPOSED PROGRAM IS MATERIALLY DIFFERENT FROM SPIRE**
8 **MISSOURI'S CURRENT PAYMENT PARTNER PROGRAM. HOW DO YOU**
9 **RESPOND?**

10 A. As part of the Stipulation and Agreement filed in Case No. GR-2021-0127, Spire Missouri
11 agreed to file a tariff for a new program similar to Ameren Missouri's Keeping Cool
12 Program in its next rate case. The Company agrees that there are several similarities
13 between the proposed Keeping Families Warm program and Spire Missouri's current
14 programs, the Payment Partner Program and the Critical Needs Program. Given this, and
15 the fact that Spire Missouri already has several other assistance programs available, Spire
16 Missouri is open to dropping the proposal of this program if the parties in the case agree.
17 One key difference with the Keeping Families Warm program is that the participant can
18 choose their preferred due date at enrollment to match when they regularly receive income.
19 This helps the participant budget their income and avoid late payments. Spire Missouri is
20 open to working with the parties on developing the best program or programs to best help
21 our customers in need, including a version of OPC Witness Marke's proposed program to
22 waive the customer charge.

1 **Q. OPC WITNESS MARKE STATES OPC IS GENERALLY SUPPORTIVE OF**
2 **CONSUMER COUNCIL OF MISSOURI (“CCM”) WITNESS THOMAS’S**
3 **RECOMMENDATIONS REGARDING TARGETED MARKETING AND**
4 **ASPIRATIONAL TARGETS FOR SPIRE MISSOURI’S INCOME-ELIGIBLE**
5 **PROGRAMS. HOW DO YOU RESPOND?**

6 A. The specific proposals OPC witness Marke is referring to are the recommendations by
7 CCM witness Thomas, which are: (1) that the Spire Payment Partner and Critical Medical
8 Needs programs incorporate annual targets for enrollment with input from stakeholders;
9 and (2) that Spire Missouri initiate targeted marketing for these programs, as well as an
10 increased emphasis on its Dollar Help program.¹ The Company is open to CCM Witness
11 Thomas’s recommendation to target specific resources and programs to educate customers
12 about the availability and services of the low-income customer assistance programs,
13 especially focusing on high energy burden neighborhoods. Spire Missouri has been
14 utilizing its energy burden tool to identify areas for marketing. The Company also is open
15 to creating targets for enrollment.

16 **Q. OPC WITNESS MARKE BELIEVES THE COMMISSION SHOULD CONSIDER**
17 **SPIRE MISSOURI’S EXISTING INCOME ELIGIBLE PROGRAMS AND**
18 **PROPOSED RATE DESIGN AS ADDRESSING THREE SEPARATE BUT**
19 **INTERRELATED PROBLEMS THAT IMPACT SPIRE MISSOURI’S MOST**
20 **VULNERABLE CUSTOMERS. HOW DO YOU RESPOND?**

¹ Dr. Marke summarizes CCM’s targeted marketing and aspirational targets on page 6, lines 11-13 and page 7, lines 1-5 of his rebuttal testimony, stating, “CCM witness Jim Thomas recommended that Spire Payment Partner and Critical Medical Needs programs initiate annual targets for enrollment with input from stakeholders. Mr. Thomas also recommended increased funding, enrollment, and outreach for Spire’s Rehousing program. Finally, Mr. Thomas recommends that Spire initiate targeted marketing for these programs, as well as an increased emphasis on its Dollar Help program” (citations omitted).

1 A. Table 2 from Dr. Marke’s rebuttal testimony (below) includes a breakdown of the problems
 2 identified by Dr. Marke, which are affordability, crisis response, and bill stability, and the
 3 programs that Spire Missouri currently has in place or are proposed as part of this case and
 4 are responsive to those problems. This table shows the breadth of the Company’s low-
 5 income eligible programs and may highlight a need to narrow the program or programs
 6 that may address the problems identified by Dr. Marke.

Table 2: Breakdown of Spire’s income-eligible programs and what problem it addresses

Problem	Company Response
Bill Affordability Are existing bills affordable?	<ul style="list-style-type: none"> • Spire Income Eligible Rate Design (Proposed)
Crisis Response Is there an Emergency Situation?	<ul style="list-style-type: none"> • Critical Medical Needs • Rehousing • Dollar Help
Bill Stability Are arrearages and bill volatility an issue?	<ul style="list-style-type: none"> • Payment Partner • Keeping Warm (proposed) • Budget Billing • Weatherization

7
8

9 **Q. OPC WITNESS MARKE RECOMMENDS THE COMMISSION MAINTAIN THE**
 10 **CURRENT FUNDING LEVELS FOR EXISTING PROGRAMS AND SUPPORT**
 11 **THE NEW INCOME-SPECIFIC RATE DESIGN FOR ELIGIBLE RESIDENTIAL**
 12 **CUSTOMERS. HOW DO YOU RESPOND TO DR. MARKE’S**
 13 **RECOMMENDATIONS?**

14 A. Spire Missouri is not proposing any change in funding for its existing programs. The
 15 Company would also support a pilot version of OPC Witness Marke’s proposed Spire
 16 Missouri’s Income Eligible Rate Design, but there needs to be a funding limit or cap. Dr.

1 to ensure customers are not able to take advantage of switching between the two rate
2 classes. The revenues associated with rate switching are addressed in Company witness
3 Lavin's testimony.

4 **VII. CONCLUSION**

5 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

6 A. Yes.






johnson surrebuttal affidavit

Final Audit Report

2025-06-30

Created:	2025-06-30
By:	Antonio Arias (Antonio.Arias@spireenergy.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAZ_yCZRxwqsNRktLtslYdSTUQn4I7kGFH

"johnson surrebuttal affidavit" History

-  Document created by Antonio Arias (Antonio.Arias@spireenergy.com)
2025-06-30 - 5:53:27 PM GMT
-  Document emailed to Julie Johnson (julie.johnson@spireenergy.com) for signature
2025-06-30 - 5:53:31 PM GMT
-  Email viewed by Julie Johnson (julie.johnson@spireenergy.com)
2025-06-30 - 5:53:41 PM GMT
-  Document e-signed by Julie Johnson (julie.johnson@spireenergy.com)
Signature Date: 2025-06-30 - 6:12:54 PM GMT - Time Source: server
-  Agreement completed.
2025-06-30 - 6:12:54 PM GMT