

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Spire Missouri Inc.	)	
d/b/a Spire's Application to Update its	)	
Weather Normalization Adjustment	)	Case No. GO-2026-0001
Rider (WNAR) for Spire East and	)	
Spire West	)	

**RESPONSE TO APPLICATION TO UPDATE WEATHER NORMALIZATION  
ADJUSTMENT RIDER FOR SPIRE EAST AND SPIRE WEST**

**COMES NOW** the Office of the Public Counsel ("OPC") and for its *Response to Application to Update Weather Normalization Adjustment Rider for Spire East and Spire West*, states as follows:

1. On July 1, 2025, Spire Missouri Inc. ("Spire Missouri" or "Company") filed an *Application* in the above styled case seeking for the Commission to order the adoption of a new tariff sheet that would revise the Weather Normalization Adjustment Rider ("WNAR") rates currently in effect for Spire East and Spire West.

2. Spire's *Application* states that if the Commission orders the adoption of the tariff sheet as proposed, the new WNAR rates would be "\$0.05128 per Ccf of gas used for Spire East and \$0.03246 per Ccf of gas used for Spire West."

3. Spire's currently authorized WNAR was established by this Commission in case GR-2017-0215 and GR-2017-0216 (for Spire East and Spire West, respectively).<sup>1</sup>

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<sup>1</sup> At the time, Spire East was doing business under the name Laclede Gas Company and Spire West was doing business under the name Missouri Gas Energy.

4. One of the issues the Commission addressed when it established the Company's WNAR in that case was whether there should be a limit on the dollar per Ccf rate that could appear in the rider.

5. As it relates to the issue of this limit, the Commission ultimately found as follows:

The Commission further finds that the \$0.01 per therm (or ccf) limit on adjustments under the WNAR tariff as proposed by Staff should be eliminated but that a limit of \$0.05 per therm (or ccf) on upward adjustments should be included. This will ensure that any monthly increase for the average customer will not be so high as to create rate shock, while providing customers with an opportunity to receive a larger monthly decrease if the weather is exceptionally cold. The WNAR tariff shall also provide that any adjustments falling outside the \$0.05 limit will be deferred for recovery from customers in the next WNAR adjustment. Thus, this mechanism becomes similar to the PGA/ACA process with regard to adjustments and a true-up period.

6. Because Spire's currently proposed tariff sheet would result in an authorized WNAR for Spire East of "\$0.05128 per Ccf of gas" as described by Spire itself, the proposed tariff sheet exceeds the rate limit imposed by the Commission in GR-2017-0215.<sup>2</sup>

7. Pursuant to the Commission's order in GR-2017-0215, the Commission should therefore deny Spire's proposed tariff sheet and instead order Spire to file a new tariff sheet that limits the WNAR rate for Spire East to \$0.05 per Ccf.

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<sup>2</sup> Because the proposed WANR rate increase for Spire West is "\$0.03246 per Ccf of gas[.]" it does not exceed the limit and thus is not at issue.

8. Further, as stated in the Commission's order in in GR-2017-0215, the tariff sheet should also provide that the excess above \$0.05 per Ccf "be deferred for recovery from customers in the next WNAR adjustment."

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission issue an order denying Spire's filed tariff sheet and instead order the issuance of a new tariff sheet consistent with the Commission's order in case GR-2017-0215 and any other such relief as is just and reasonable.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this Fourth day of August, 2025.

/s/ John Clizer