

<b>Exhibit No:</b>	—
<b>Issue:</b>	<b>Case Overview</b>
	<b>RNG Program</b>
<b>Witness:</b>	<b>Eric Bouselli</b>
<b>Type of Exhibit:</b>	<b>Direct Testimony</b>
<b>Sponsoring Party:</b>	<b>Spire Missouri Inc.</b>
<b>Case No.:</b>	<b>GO-2026-XXXX</b>
<b>Date Testimony Prepared:</b>	<b>November 5, 2025</b>

**SPIRE MISSOURI INC.**  
**CASE NO. GO-2026-XXXX**

**DIRECT TESTIMONY**  
**OF**  
**ERIC BOUSELLI**

**\*\*Denotes Confidential Information\*\***

**TABLE OF CONTENTS**

<b>I.</b>	<b>INTRODUCTION.....</b>	<b>1</b>
<b>II.</b>	<b>PURPOSE OF TESTIMONY .....</b>	<b>2</b>
<b>III.</b>	<b>RENEWABLE NATURAL GAS BACKGROUND .....</b>	<b>3</b>
<b>IV.</b>	<b>RNG LEGISLATION AND RULEMAKING .....</b>	<b>5</b>
<b>V.</b>	<b>PRODUCTION/PROCESSING ASSET CONSIDERATIONS.....</b>	<b>6</b>
<b>VI.</b>	<b>SPIRE MISSOURI'S RENEWABLE NATURAL GAS PROGRAM.....</b>	<b>9</b>
<b>VII.</b>	<b>CONCLUSION .....</b>	<b>11</b>

**DIRECT TESTIMONY OF ERIC BOUSELLI**

**I. INTRODUCTION**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23

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

A. My name is Eric Bouselli, and my business address is 700 Market Street, St. Louis, Missouri 63101.

**Q. WHAT IS YOUR PRESENT POSITION?**

A. I am the Manager, Regulatory Strategy & Forecasting for Spire Missouri Inc. (“Spire Missouri” or the “Company”).

**Q. PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.**

A. I have been in my present position since January 2022. In this role, I am responsible for the advancement of regulatory programs and constructs and the related forecasting and modeling. Before being promoted, I was a Lead in Financial Reporting with most of my time devoted to serving as the financial liaison with the regulatory group during the Spire Missouri GR-2021-0108 rate case process.

**Q. PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL EXPERIENCE AT SPIRE MISSOURI.**

A. I joined Spire Missouri in 2013 as a financial analyst. Since that time, I have worked in various positions within the Finance organization along with working on teams that implemented several IT software solutions and identified process improvements.

**Q. PLEASE BRIEFLY DESCRIBE YOUR PREVIOUS PROFESSIONAL EXPERIENCE PRIOR TO JOINING SPIRE MISSOURI.**

A. Prior to being employed by Spire Missouri, I was employed by RubinBrown LLP as an Analyst. I performed detailed analyses pertaining to business valuation, litigation support,

1 and other miscellaneous financial projects. I worked directly with clients and was involved  
2 in project strategy formation. Among other things, I was also responsible for preparing  
3 detailed reports summarizing analyses performed and conclusions reached as a result of  
4 those analyses.

5 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

6 A. I graduated from the University of Missouri Trulaske College of Business in 2007 with a  
7 Masters in Accounting. I also am a licensed certified public accountant in the state of  
8 Missouri.

9 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MISSOURI  
10 PUBLIC SERVICE COMMISSION (“COMMISSION”)?**

11 A. Yes. I filed testimony in Case Nos. GR-2022-0179, GO-2024-0180 and GR-2025-0107. I  
12 am also filing testimony in Case No. GA-2026-xxxx, the Company’s application for a  
13 certificate of convenience and necessity for renewable natural gas infrastructure, filed  
14 concurrently with this Application.

15 **II. PURPOSE OF TESTIMONY**

16 **Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

17 A. The purpose of my testimony is to provide background on renewable natural gas (“RNG”),  
18 discuss the Missouri legislation authorizing RNG programs, the Commission rulemaking,  
19 and the final promulgated rule, highlight key differences and considerations of RNG  
20 production, and support for the Company’s application for a renewable natural gas program  
21 (“Program”), and additional considerations that should be made for production assets.

22 **Q. WHY IS SPIRE FILING THIS APPLICATION?**

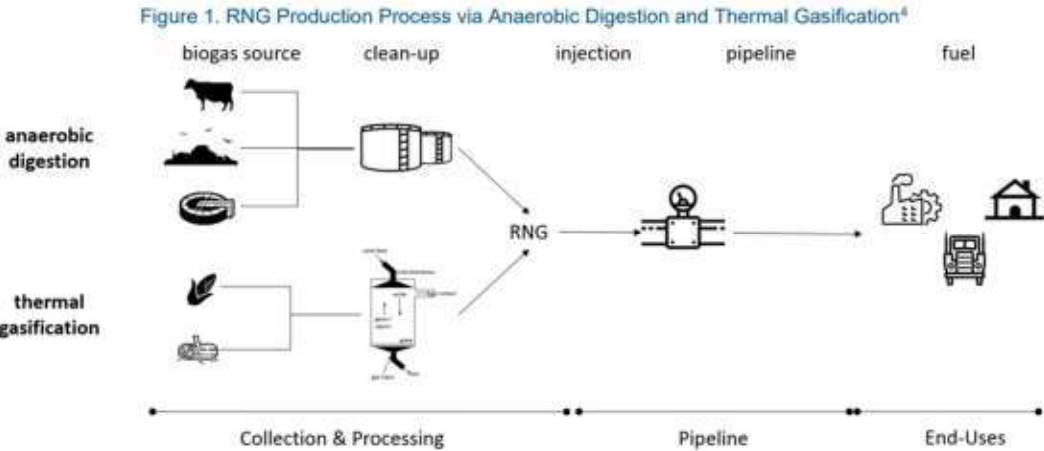
1 A. Spire is making this filing to comply with Section 386.895, RSMo, and 20 CSR 4240-  
2 40.100. Additionally, pursuant to Section 393.170, RSMo, and 20 CSR 4240-2.060, 20  
3 CSR 4240-3.205, and 20 CSR 4240-40.100.

4 **III. RENEWABLE NATURAL GAS BACKGROUND**

5 **Q. WHAT IS RNG?**

6 A. According to the US Environmental Protection Agency, RNG is biogas that has been  
7 upgraded for use in place of conventional natural gas. This biogas used in the production  
8 of RNG can come from a variety of sources including municipal solid waste landfills,  
9 digesters at wastewater treatment plants, livestock farms, food production facilities and  
10 organic waste management operations. The RNG can be used locally at the site of  
11 production or can be injected into natural gas transmission or distribution pipelines.<sup>1</sup>

12 The following figure and table depict the RNG production process and details of the  
13 different feedstock sources.<sup>2</sup>



15

---

<sup>1</sup> *Renewable Natural Gas*, U.S. EPA, January 29, 2025, <https://www.epa.gov/lmop/renewable-natural-gas>.

<sup>2</sup> *ICF Assessment of Renewable Natural Gas Potential for Spire Missouri*, August 2022, p. 4 and 9.

Table 2. RNG Feedstock Types

Feedstock for RNG		Description
Anaerobic Digestion	Animal manure	Manure produced by livestock, including dairy cows, beef cattle, swine, sheep, goats, poultry, and horses.
	Food waste	Commercial, industrial and institutional food waste, including from food processors, grocery stores, cafeterias, and restaurants.
	Landfill gas (LFG)	The anaerobic digestion of organic waste in landfills produces a mix of gases, including methane (40–60%).
	Water resource recovery facilities (WRRF)	Wastewater consists of waste liquids and solids from household, commercial, and industrial water use; in the processing of wastewater, a sludge is produced, which serves as the feedstock for RNG.
Thermal Gasification	Agricultural residue	The material left in the field, orchard, vineyard, or other agricultural setting after a crop has been harvested. Inclusive of unusable portion of crop, stalks, stems, leaves, branches, and seed pods.
	Energy crops	Inclusive of perennial grasses, trees, and annual crops that can be grown to supply large volumes of uniform and consistent feedstocks for energy production.
	Forestry and forest product residue	Biomass generated from logging, forest and fire management activities, and milling. Inclusive of logging residues, forest thinnings, and mill residues. Also, materials from public forestlands, but not specially designated forests (e.g., roadless areas, national parks, wilderness areas).
	Municipal solid waste (MSW)	Refers to the biogenic fraction of waste that would be landfilled after diversion of other waste products (e.g., food waste or other organics), including paper and paperboard, and yard trimmings.

1

2 **Q. WHAT ARE ITS USES?**

3 A. RNG is interchangeable with conventional natural gas and can be used for residential,  
4 commercial, industrial and transportation applications.

5 **Q. WHAT ARE THE BENEFITS OF RNG USE?**

6 A. There are many benefits related to the production and use of RNG including fuel diversity,  
7 economic benefits, and environmental benefits.<sup>3</sup> The use of RNG increases and diversifies  
8 domestic energy production and leverages existing infrastructure. The production supports  
9 a distributed generation of energy which promotes lower transport costs and higher grid  
10 reliability. Depending on the feedstock source, RNG can be produced 24/7/365 with  
11 reliability rates of up to 95%; the average reliability rate for solar power is 25% and 35%  
12 for wind power.<sup>4</sup> The economic benefits of RNG production can benefit local economies

<sup>3</sup> *Renewable Natural Gas*, U.S. EPA, January 29, 2025, <https://www.epa.gov/lmop/renewable-natural-gas>.

<sup>4</sup> *Harness the Benefits of Biogas*, American Biogas Council, <https://americanbiogascouncil.org/resources/why-biogas>.

1 through the construction of necessary infrastructure. These projects can provide a cost-  
2 effective solution for turning waste treatment costs into revenue generating opportunities  
3 or reducing the volumes of waste and related costs. These additional revenue streams can  
4 help rural America by building resiliency against commodity price fluctuations.<sup>5</sup> Many  
5 different incentives are also available at various levels that can promote the economics of  
6 RNG projects for developers and their partners. There are also multiple environmental  
7 benefits. Local air quality can be improved through the burning RNG in vehicles compared  
8 to traditional diesel and gas engines. Additionally, there are numerous benefits to the  
9 agriculture community including better capture of nutrients which can result in lower input  
10 costs, cleaner water ways, reduction of odors due to capture and recycle of manure.<sup>6</sup>  
11 Greenhouse gas (GHG) emissions are also reduced as RNG projects capture and recover  
12 methane produced from the feedstock source.<sup>7</sup>

#### 13 **IV. RNG LEGISLATION AND RULEMAKING**

14 **Q. WILL YOU PROVIDE A BRIEF SUMMARY OF SECTION 386.895, RSMO?**

15 A. This statute was enacted in 2021, authorizing renewable natural gas programs in Missouri  
16 that can include qualified investments in RNG infrastructure and procurements of RNG  
17 volumes, and requiring the Commission to adopt rules for gas corporations to offer RNG  
18 programs. The rules would establish reporting requirements and “a process for gas  
19 corporations to **fully recover any costs** that are prudent, just, and reasonable associated  
20 with a renewable natural gas program.”<sup>8</sup> The statute also allowed for “Any costs incurred

---

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Renewable Natural Gas*, U.S. EPA, January 29, 2025, <https://www.epa.gov/lmop/renewable-natural-gas>.

<sup>8</sup> Section 386.895.2(2), RSMo.

1 by a gas corporation for a qualified investment that are prudent, just, and reasonable may  
2 be recovered by means of an automatic rate adjustment clause.”<sup>9</sup>

3 **Q. DID THE COMMISSION ADOPT RULES AS DIRECTED BY SECTION 386.895,**  
4 **RSMO?**

5 A. Yes. In August 2021, the Commission opened Case No. GW-2022-0060 for review and  
6 consideration of promulgating rules consistent with the legislation. That docket informed  
7 Commission Staff in the drafting of rules put forth in Case No. GX-2024-0326, which was  
8 opened in May 2024. The resulting rules were effective December 30, 2024. The final rule  
9 is found at 20 CSR 4240-40.100 and includes the requirements for applications for RNG  
10 programs.

11 **Q. WERE STAKEHOLDERS GIVEN OPPORTUNITIES TO WEIGH IN ON THE**  
12 **RULES PUT FORTH BY THE COMMISSION?**

13 A. Yes. Spire Missouri, and other gas utilities and industry players, provided feedback to the  
14 Commission Staff and attended public hearings to clarify positions.

15 **V. PRODUCTION/PROCESSING ASSET CONSIDERATIONS**

16 **Q. WHAT TYPES OF INVESTMENTS FALL UNDER SECTION 386.895, RSMO?**

17 A. Section 386.895, RSMo lists “all equipment and facilities for the production, processing,  
18 pipeline interconnection, and distribution of renewable natural gas to be furnished to  
19 Missouri customers” as potential qualified investments.<sup>10</sup>

---

<sup>9</sup> Section 386.895.5, RSMo.

<sup>10</sup> Section 386.895.1(4), RSMo, defines *qualified investment* as, “any capital investment in renewable natural gas infrastructure incurred by a gas corporation for the purpose of providing natural gas service under a renewable natural gas program.” Section 386.895.1(7), RSMo, defines *renewable natural gas infrastructure* as, “all equipment and facilities for the production, processing, pipeline interconnection, and distribution of renewable natural gas to be furnished to Missouri customers.”

1 **Q. ARE THERE DIFFERENCES BETWEEN THESE TYPES RNG**  
2 **INFRASTRUCTURE?**

3 A. Yes. There are two general groupings of RNG infrastructure that can be made: 1)  
4 production and processing infrastructure and 2) interconnection and distribution  
5 infrastructure.

6 **Q. COULD YOU ELABORATE ON THE INTERCONNECTION AND**  
7 **DISTRIBUTION INFRASTRUCTURE?**

8 A. While not RNG related, gas utilities have traditionally been involved in making  
9 investments in the latter category as part of owning and operating gas distribution systems.  
10 These are investments that the Commission and other regulators are used to reviewing and  
11 have an understanding of costs involved. Additionally, there are typically minimal annual  
12 O&M costs associated with these investments, with depreciation being the primary  
13 expense. The required investment is also not typically substantial, generally \$2 to \$4  
14 million for an interconnect and a range of \$667 to \$817 per linear foot of 6” steel pipeline.  
15 The total distribution and transmission pipeline costs are project specific. Compared to  
16 production and processing investments, these will typically be smaller investments and  
17 there are fewer operating risks.

18 **Q. HOW ARE PRODUCTION/PROCESSING INVESTMENTS EXPECTED TO BE**  
19 **DIFFERENT?**

20 A. There are three ways production and processing investments are different from  
21 interconnect investments: 1) significantly higher investment costs; 2) increased operation  
22 and maintenance costs required to operate the facilities; and 3) the ability to generate both  
23 fuel for the distribution system as well as intangible, marketable environmental attributes.

1 **Q. WHAT IS THE RANGE OF INVESTMENT REQUIRED FOR RNG**  
2 **PRODUCTION AND PROCESSING ASSETS?**

3 A. The average RNG facility costs \$17 million to construct, with actual costs ranging from  
4 under \$1 million to over \$100 million depending on the project specifics.<sup>11</sup>

5 **Q. WHAT O&M EXPENDITURES ARE TYPICALLY REQUIRED FOR THE SAFE,**  
6 **RELIABLE OPERATION OF RNG PRODUCTION/PROCESSING ASSETS?**

7 A. There are multiple types of costs required to operate and maintain these types of assets in  
8 order to generate RNG. First, there are the costs to process the raw biogas into RNG such  
9 as electricity, various chemical/media costs, periodic major consumable replacement, plus  
10 maintenance of the equipment. Second, there are costs related to monitoring the equipment  
11 operation and gas quality. Third, there may be external and/or internal labor costs to  
12 perform the aforementioned functions.

13 **Q. ARE RNG PRODUCTION/PROCESSING ASSETS ABLE TO PRODUCE RNG**  
14 **WITHOUT O&M COSTS?**

15 A. No.

16 **Q. WILL ANY RNG ENVIRONMENTAL ATTRIBUTES BE GENERATED**  
17 **WIHTOUT O&M COSTS?**

18 A. No.

19 **Q. WHAT DOES COMMISSION RULE 20 CSR 4240-40.100(5)(B) STATE?**

---

<sup>11</sup> *Renewable Natural Gas Q&A*, Coalition for Renewable Natural Gas, Inc.,  
<https://www.rngcoalition.com/rng-qa>.

1 A. That section speaks to the treatment and reporting of RNG attributes, and it says, “all costs  
2 and all revenues are passed through to customers as provided for in section (4) of this rule  
3 or through a general rate proceeding.”

4 **Q. SHOULD “ALL COSTS” INCLUDE O&M COSTS NEEDED TO GENERATE  
5 THE ATTRIBUTES?**

6 A. Yes.

7 **Q. ARE THERE OTHER BENEFITS APART FROM POTENTIAL ATTRIBUTE  
8 REVENUE THAT CUSTOMERS WILL RECEIVE?**

9 A. Yes. Customers will be able to utilize the pipeline quality gas immediately upon its  
10 generation and subsequent movement into Spire Missouri’s distribution system.

11 **VI. SPIRE MISSOURI’S RENEWABLE NATURAL GAS PROGRAM**

12 **Q. WHAT IS SPIRE MISSOURI INCLUDING IN ITS RENEWABLE NATURAL GAS  
13 PROGRAM?**

14 A. Pursuant to 20 CSR 4240-40.100(2), Spire Missouri is requesting approval of an RNG  
15 program that includes a qualified investment in RNG infrastructure. At this time, Spire  
16 Missouri’s RNG program does not include the procurement of RNG volumes. For future  
17 consideration in its RINGRAM filing, the Company has also included its projected O&M  
18 costs.

19 **Q. PLEASE DISCUSS THE QUALIFIED INVESTMENT IN RNG  
20 INFRASTRUCTURE.**

21 A. In late 2021, the City of Kansas City, Missouri, through its Water Services Department  
22 (“KC Water”) issued a public request of interest to beneficially utilize the biogas generated  
23 by the Blue River Wastewater Treatment Plant (“Blue River WWTP”) and issued a

1 subsequent request for proposal. Spire Missouri submitted its proposal on March 10, 2023.  
2 While multiple parties also responded to KC Water’s requests, Spire Missouri was  
3 ultimately awarded the contract in October 2023. The contract was signed on and Spire  
4 Missouri received the notice to proceed with work on December 22, 2023. The RNG  
5 infrastructure will be constructed and owned by the Company at the Blue River WWTP  
6 and will consist of a biogas upgrading facility with a meter and regulation interconnect  
7 and 1,200 feet of 6-inch steel pipe to connect the new biogas upgrading facility to Spire  
8 Missouri’s existing distribution infrastructure (collectively, “the Project”).

9 **Q. PLEASE DESCRIBE THE AGREEMENT TERMS.**

10 A. KC Water will have title to the biogas generated at the Blue River WWTP until it is  
11 delivered to the specified delivery point. Spire Missouri will own and operate the  
12 production, processing, pipeline interconnection equipment, and transmission to the  
13 Company’s distribution system. The Company will have full title to the RNG generated;  
14 however, Spire Missouri is required to share a percentage of revenue from the sale of  
15 environmental attributes with KC Water.

16 **Q. WHAT IS THE TIMING OF THE ANTICIPATED PROJECT INVESTMENTS?**

17 A. The official start of procurement for the Project started in late calendar year 2024 and will  
18 continue through Spire Missouri’s fiscal year 2025. Site construction is scheduled to start  
19 in fiscal year 2026, with an anticipated in-service date in February 2027. At this point,  
20 pipeline quality gas is expected to be available for customer consumption.

21 **Q. WHAT ARE THE EXPECTED BENEFITS OF THIS PROJECT FOR**  
22 **MISSOURIANS?**

1 A. There are multiple benefits for Missourians manifesting in different forms. First, there will  
2 be benefits from a Spire Missouri customer perspective. The Project will generate  
3 approximately 175,000 MMBtu of pipeline quality gas annually. This is the equivalent to  
4 supplying approximately 2,500 residential customers in Spire Missouri's western territory.  
5 Additionally, this Project represents a behind-the-city-gate resource that enhances the  
6 overall system resiliency and reliability of Spire Missouri's western distribution system.  
7 Second, regardless of Spire Missouri customer status, the Project will assist KC Water with  
8 improving air quality near their wastewater facility by capturing emissions that otherwise  
9 would be emitted into the air. KC Water estimates it will reduce greenhouse gas emissions  
10 by approximately 20,000 tons of CO2 equivalent per year. Third, revenues generated from  
11 sales of environmental attributes will be used by Spire Missouri to lower costs to its  
12 customers, and KC Water will receive a portion of the revenues to offset its capital costs.

13 **Q. DOES SPIRE MISSOURI'S PROGRAM APPLICATION INCLUDE ALL OF THE**  
14 **REQUIREMENTS SPELLED OUT IN COMMISSION RULE 20 CSR 4240-**  
15 **40.100(2)?**

16 A. Yes.

17 **VII. CONCLUSION**

18 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

19 A. Yes, it does.

