

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

In the Matter of the Application of Spire)	
Missouri Inc. for Approval of a Certificate of)	
Convenience and Necessity to Construct and)	Case No. GA-2026-xxxx
Operate Renewable Natural Gas Infrastructure)	
In Kansas City, Missouri)	

**APPLICATION FOR CERTIFICATE OF CONVENIENCE
AND NECESSITY AND REQUEST FOR WAIVER**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”), by and through its undersigned counsel, and, pursuant to Section 393.170.1 RSMo, 20 CSR 4240-2.060, 20 CSR 4240-3.205, and 20 CSR 4240-40.100, respectfully submits this application to the Missouri Public Service Commission (“Commission”) for a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage equipment and facilities for the production, processing, pipeline interconnection, and distribution of renewable natural gas. Pursuant to Commission Rule 20 CSR 4240-4.017(1)(D), the Company also requests a waiver from the notice provisions of Rule 20 CSR 4240-4.017(1). In support of its application and request for a waiver, Spire Missouri states as follows:

1. Spire Missouri is a public utility and gas corporation incorporated under the laws of the State of Missouri, with its principal office located at 700 Market Street, St. Louis, Missouri 63101.
2. A Certificate of Good Standing evidencing Spire Missouri’s standing to do business in Missouri was submitted in Case No. GF-2025-0053 and is incorporated by reference herein for all purposes. The information in such Certificate is current and correct.
3. Spire Missouri is engaged in the business of distributing and transporting natural gas

to customers in Missouri as a gas corporation subject to the jurisdiction of the Commission. The Company provides gas service in Missouri to customers in the City of St. Louis and the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, St. Genevieve, St. Francois, Madison, Butler, Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Cooper, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Newton, Pettis, Platte, Ray, Saline, Stone, and Vernon.

4. Other than cases that have been docketed at the Commission, Spire Missouri has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three years that involve customer service or rates. Spire Missouri has no annual report or assessment fees that are overdue.

5. All correspondence, communications, notices, orders, and decisions of the Commission with respect to this matter should be sent to the undersigned counsel and to:

Eric Bouselli
Manager, Regulatory Strategy and Forecasting
Spire Missouri Inc.
700 Market Street, 5th Floor
St. Louis, Missouri 63101
(314) 342-3336
eric.bouselli@spireenergy.com

6. Attached is a signed affidavit of Eric Bouselli, Manager, Regulatory Strategy and Forecasting, for Spire Missouri, asserting that all information in this Application is accurate and truthful.

CERTIFICATE OF CONVENIENCE AND NECESSITY

7. Spire Missouri submits this application for a CCN to construct, install, own, operate, maintain, and otherwise control and manage equipment and facilities for the production, processing, pipeline interconnection, and distribution of renewable natural gas. The Company is requesting

permission and approval to construct and operate a biogas upgrading facility that will produce renewable natural gas, a meter and regulation interconnect, and a transmission line to its distribution system. These assets, (collectively, the “Project”) represent qualified investments¹ in renewable natural gas infrastructure² under Section 386.895, RSMo. The Company is concurrently filing for approval of its renewable natural gas program pursuant to 20 CSR 4240-40.100.

PROJECT DESCRIPTION

8. The City of Kansas City, Missouri (“Kansas City”) through its Water Services Department (“KC Water”) issued a public request of interest to beneficially utilize the biogas generated by the KC Water’s Blue River Wastewater Treatment Plant (“Blue River WWTP”) in late calendar 2021 and a subsequent request for proposal. Spire Missouri submitted its proposal on March 10, 2023. Multiple parties responded to KC Water’s requests; however, Spire Missouri was ultimately awarded the contract in October 2023 and received the notice to proceed with work on December 22, 2023. Attached as **Appendix 1**,³ is the Biogas Use Applications Project Agreement (the “Agreement”) entered into by Spire Missouri and the City of Kansas City, Missouri.

9. The Blue River WWTP is a 105 million gallons per day municipal wastewater treatment facility that discharges treated effluent into the Missouri River. It receives and processes over 95 percent of the solids from KC Water’s service area. KC Water is in the process of modifying the Blue River WWTP by upgrading the solids handling facility with a thermal hydrolysis process and significant improvements to the anaerobic digesters and other systems needed to support

¹ 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.”

² 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.”

³ Appendix 1 has been marked as Confidential pursuant to Commission Rule 20 CSR 4240-2.135(2)(A)3 and 4 because it contains information regarding market-specific information.

process operations. Biogas will be produced from the digestion process and is a renewable energy source that may be used for the creation of RNG once captured and cleaned. The Project is meant to capture and clean the biogas and inject the resulting RNG into Spire Missouri's western distribution system for customers to use.

10. As discussed above, the Project will consist of the construction of a biogas upgrading facility with a meter and regulation interconnect at the Blue River WWTP at 7300 Hawthorne Road in Jackson County, MO. Once completed, the biogas upgrading facility is expected to receive approximately 307,500,000 standard cubic feet ("scf") of raw biogas per year which it will transform into over 175,000 MMBtu of pipeline quality gas. The equipment that will be installed on site as part of the RNG Upgrading system includes a H₂S removal system, oxygen and nitrogen removal system, and a CO₂ removal system. This site will also house a series of chromatograph equipment that will evaluate the quality of the gas being upgraded.

11. Spire Missouri will also construct 1,200 feet of 6-inch steel to connect the new biogas upgrading facility to Spire Missouri's distribution infrastructure on the west side of I-435. This distribution line carrying the RNG will exit the Blue River WWTP site and travel north across Hawthorne Road and northeast through three City of Kansas City parcels.

12. The upgrade facility and interconnect will be located in Section 25, Township 50 North, Range 33, at 7300 Hawthorne Road, Kansas City, MO 64120, and the distribution line will be located in Section 25, Township 50 North, Range 33 and Section 30, Township 50 North, Range 32, all of which are in Jackson County and are already certificated areas in Spire Missouri's territory. In accordance with 20 CSR 4240-3.205(1)(B) 1 and 2, **Appendix 2**⁴ provides the design drawings of the upgrading facility, interconnect located at the Blue River WWTP, and connecting distribution

⁴ Appendix 2 has been marked confidential pursuant to 20 CSR 4240-2.135(2)(A) 7, as it relates to the security of the Company's facilities.

line to our system, and **Appendix 3**⁵ provides the listing of utilities, railroad tracks and any underground facilities which the proposed construction will cross. Permits will be needed from Union Pacific and Canadian Pacific Kansas City for the proposed railroad crossings. Easements are also required for crossing three parcels owned by the City of Kansas City. The steps for acquiring the easements have begun and the permitting process will start closer to the beginning of construction.

13. The current cost estimate for the Project is approximately **[REDACTED]**. A detailed breakdown of this estimate can be found in **Appendix 4**.⁶

14. Procurement for the Project officially started in late calendar 2024 and is set to continue during Spire Missouri's fiscal 2025. The procurement process includes the expected purchase of the biogas skid, meter and regulation interconnect skid, and electrical equipment. Site construction is scheduled to start in Spire Missouri's fiscal 2026 with an anticipated in-service date of February 2027.

15. Spire Missouri is working with Burns & McDonnell Engineering Company, Inc. ("Burns & McDonnell"), which will be leading the engineering, procurement, and construction of the upgrade facility. Burns & McDonnell will solicit a minimum of three bids for each scope item. All large procurement items will be analyzed and reviewed by Burns & McDonnell, with Spire Missouri having the final approval for the selection of the vendor or contractor. The Company will bid out the construction of the 1,200-foot interconnecting pipeline to the existing distribution asset and will solicit three bids from pre-qualified pipeline contractors.

16. The plans for operations and maintenance of the Project assets are included in the

⁵ Appendix 3 has been marked confidential pursuant to 20 CSR 4240-2.135(2)(A) 7, as it relates to the security of the Company's facilities.

⁶ Appendix 4 has been marked confidential pursuant to 20 CSR 4240-2.135(2)(A) 3 and 4, as it contains market specific information.

Agreement provided as Appendix 1. In the Agreement, Appendix N – Operations, Maintenance, and Management Plans lays out the current plans for operating and maintaining the infrastructure built as part of the Project. This plan is subject to change and may be updated during the remaining design, construction, and commissioning phases of the Project.

17. Consent and approval of the affected governmental body to build this project within the City of Kansas City is evidenced by the Agreement between Spire Missouri and Kansas City, attached as Appendix 1.

THE PROJECT IS NECESSARY AND CONVENIENT FOR THE PUBLIC SERVICE

18. The answer that must ultimately be answered in an application for a certificate of convenience and necessity is whether the application is in the public interest. In answering this question, the Commission applies the *Tartan*⁷ Factors. These factors are as follows: (1) need for the project; (2) economic feasibility of the project; (3) ability of the applicant to finance the project; (4) qualifications of the applicant to construct the project; and (5) whether the project is in the public interest. An affirmative finding on the first four factors generally leads to the conclusion that the public interest factor is satisfied.

19. Discussed in more detail in the attached direct testimony of Eric Bouselli, the Project meets all the *Tartan* factors. First, there is need for the Project, as KC Water needs to meet certain regulatory requirements and offset capital costs. Spire Missouri customers will also benefit from natural gas being generated behind the city-gate, enhancing system resiliency, reliability, and affordability. Second, the Project is economically feasible. The Company has performed analysis to estimate the levelized cost of gas⁸ that is expected to be generated over the 20-year life of the Project

⁷ *In re Tartan Energy Company*, 3 Mo. P.S.C. 173, 177 (1994).

⁸ The levelized cost of gas is a cost per MMBtu measure that looks at the capital cost, fixed and variable O&M costs, and other costs, including rate of return, as well as offsetting revenues associated with the generated RNG over the life of the Project.

and compared it to the estimated forecast of cost to procure natural gas from traditional sources. The estimated levelized cost of gas over the life of the project of ** [REDACTED] ** prior to consideration of avoided gas costs. The estimated average cost of gas over the life of the project after consideration of avoided gas costs is ** [REDACTED] **. This analysis is attached as **Appendix 5**.⁹ The results demonstrate the Project is prudent, just, and reasonable given the additional benefits from natural gas being generated behind the city-gate, enhancing system resiliency and reliability. This type of supply is more comparable to on-system storage, liquified natural gas, compressed natural gas, etc. versus flowing gas coming from interstate natural gas pipelines in terms of benefits and costs. There are also the planned sales of environmental attributes as well as federal tax incentives. Third, Spire Missouri has the financial ability to construct the Project. The estimated Project cost, approximately ** [REDACTED] ** before federal tax incentives or capitalized interest during construction, was included in the capital expenditure plan supporting the financing authority approved in Case No. GF-2025-0053. Fourth, Spire Missouri and Burns & McDonnell are qualified to construct the biogas upgrading facility and the natural gas pipelines to connect the facility to Spire Missouri's distribution system. Finally, as noted above, an affirmative finding on the first four factors leads to the conclusion that the fifth factor, whether the CCN is in public interest, is satisfied. This Project will benefit Kansas City, Spire Missouri's customers, and the general public. For the reasons set forth above, Commission approval of the Project and the requested CCN is in the public interest.

REQUEST FOR WAIVER FROM 60-DAY NOTICE RULE

20. Commission Rule 20 CSR 4240-4.017(1) provides, in part, as follows:

Any person that intends to file a case shall file a notice with the secretary of the commission a minimum of sixty (60) days prior to filing such case. Such notice shall

⁹ Appendix 5 has been marked as Confidential pursuant to Commission Rule 20 CSR 4240-2.135(2)(A)3 and 4 because it contains information regarding market-specific information.

detail the type of case and issues likely to be before the commission and shall include a summary of all communication regarding substantive issues likely to be in the case between the filing party and the office of the commission that occurred in the ninety (90) days prior to filing the notice.

21. Rule 20 CSR 4240-4.017(1)(D) permits a party to request a waiver of the above cited rule for good cause. The rule provision specifically provides that good cause may be established by submitting a verified declaration that the filing party has had no communication with the office of the commission within the prior one hundred fifty (150) days regarding any substantive issue likely to be in the case. The Company interprets this to mean that good cause is established if the filing party has had no communication with a member of the office of the Commission outside of pleadings or other public communications. Subject to that understanding, included in the affidavit of Eric Bouselli attached to this Application is a statement that neither the Company nor any person or entity acting on behalf of the Company, has had a communication with a member of the office of the Commission in the last 150 days regarding any substantive issues that are likely to arise in the case. For that reason, the Company requests that the Commission grant a waiver of the 60-day notice requirement.

WHEREFORE, Spire Missouri respectfully requests that the Commission waive the notice requirement of 20 CSR 4240-4.017(1), grant the requested CCN to construct and operate the Project as set forth above, and grant any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

J. Antonio Arias, MoBar #74475
Director, Associate General Counsel - Regulatory
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0655
antonio.arias@spireenergy.com

ATTORNEY FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 5th day of November, 2025.

/s/ Julie Johnson

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AFFIDAVIT

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

Eric Bouselli, of lawful age, being first duly sworn, deposes and states:

1. My name is Eric Bouselli. I am Manager, Regulatory Strategy and Forecasting for Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri 63101.

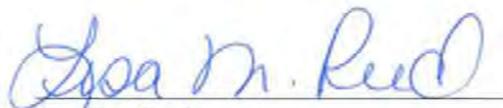
2. I have read the foregoing Application and verify that the matters and things set forth therein are true and correct to the best of my knowledge, information, and belief.

3. I hereby verify that I have read the foregoing Request for Waiver from 20 CSR 4240-4.017(1), and hereby declare that other than pleadings or other public communications, Spire Missouri Inc. has had no communication with the office of the Commission, within the prior one hundred and fifty (150) days regarding any substantive issue likely to be in the above referenced case.



Eric Bouselli

Subscribed and sworn to before me this 3 day of November 2025.



Notary Public

LISA M. REED NOTARY PUBLIC - NOTARY SEAL STATE OF MISSOURI MY COMMISSION EXPIRES DECEMBER 12, 2027 ST. CHARLES COUNTY COMMISSION #11265169
