

Exhibit No:	_____
Issue:	Case Overview
Witness:	Trisha E. Lavin
Type of Exhibit:	Direct Testimony
Sponsoring Party:	Spire Missouri Inc.
Case Nos.:	GR-2026-
Date Prepared:	November 21, 2025

SPIRE MISSOURI INC.

GR-2026-

DIRECT TESTIMONY

OF

TRISHA E. LAVIN

NOVEMBER 21, 2025

TABLE OF CONTENTS

PURPOSE 4

FILING OVERVIEW AND APPENDICES 4

COMPETITIVE BIDDING 7

INCREMENTAL COST TREATMENT 8

LEAK ELIGIBILITY 8

GR-2025-0107 STIPULATED ITEMS 8

CONCLUSION 9

DIRECT TESTIMONY OF TRISHA LAVIN

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

2 A: My name is Trisha E. Lavin and my business address is 700 Market St., St. Louis, Missouri,
3 63101.

4 **Q: WHAT IS YOUR PRESENT POSITION?**

5 A: I am presently employed as a Senior Regulatory Analyst at Spire Missouri Inc. (“Spire
6 Missouri” or the “Company”).

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

9 A: I have been in my current position since September 2022. In my position, I am responsible
10 for assisting in many facets of regulatory research, planning, and modeling. I assist in the
11 preparation of Spire Missouri’s, and its Spire East and Spire West operating units’,
12 regulatory mechanisms, including but not limited to the Company’s Infrastructure System
13 Replacement Surcharge (“ISRS”) filings.

14 **Q: WHAT WAS YOUR EXPERIENCE PRIOR TO ASSUMING YOUR CURRENT**
15 **POSITION WITH THE COMPANY?**

16 A: I joined Spire Missouri as a Regulatory Analyst in 2018 and prior to that I obtained a
17 bachelor’s degree of economics with a minor in international studies from the University
18 of Illinois-Springfield in 2017 and received my master’s degree of political science from
19 the same institution in 2019. During the master’s program I was a graduate assistant to the
20 Director of the Center for Business and Regulation within the College of Business and
21 Management. In this role, I undertook regulatory research to further understand the
22 relationship between regulators and businesses, as well as assisted in hosting the American

1 Gas Association Rate Schools in Chicago, Illinois for both the introductory and advanced
2 courses.

3 **Q: HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MISSOURI**
4 **PUBLIC SERVICE COMMISSION (“COMMISSION”)?**

5 A: Yes. I have filed testimony in Case Nos. GR-2021-0108, GO-2022-0171, GO-2023-0203,
6 GO-2023-0432, GO-2024-0214, GR-2025-0026, GR-2025-0107 and GR-2025-0206.

7 **PURPOSE**

8 **Q: WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

9 A: The purpose of my Direct Testimony is to sponsor Spire Missouri’s ISRS application and
10 supporting appendices and to provide a general overview of the Company’s ISRS requests
11 for its Spire East and Spire West operating units, discuss the ISRS revenue cap that was set
12 in Case No. GR-2025-0107, the Company’s most recent rate case, briefly describe the
13 Company’s competitive bidding process for replacements performed by contractors, and
14 explain the handling of incremental costs. I will also discuss the Company’s compliance
15 with the Commission’s order approving the stipulation reached in Case No. GR-2025-
16 0107, specifically how the inclusion of plastic retirements associated with cast iron and
17 bare steel replacements and the additional ISRS reporting requirements from the
18 Stipulation will be handled.

19 **FILING OVERVIEW AND APPENDICES**

20 **Q: PLEASE PROVIDE A DESCRIPTION OF THE COMPANY’S REQUESTS IN**
21 **THIS PROCEEDING.**

1 A: The ISRS statutes allow the Company to recover all costs associated with its ISRS eligible
2 projects that help enhance the safety and reliability of our system, including, under
3 § 393.1009(5), RSMo:

4 “any cast iron or steel facilities including any connected or associated facilities that,
5 regardless of their material, age, or condition, are replaced as part of a qualifying
6 replacement project in a manner that adds no incremental cost to a project compared
7 to tying into or reusing existing facilities.”

8 In this case, Spire Missouri is requesting recovery of the revenue requirements related to
9 ISRS eligible capital investments made from June 1, 2025, through December 31, 2025. In
10 Case No. GR-2022-0179, the Commission approved a Full Unanimous Stipulation and
11 Agreement (“Stipulation”) that included an agreement that there will be a single Spire
12 Missouri Inc. ISRS rate cap, even though the Company will maintain two separate ISRS
13 rates for its Spire East and Spire West operating units. That single Spire Missouri Inc. rate
14 cap was most recently set in GR-2025-0107.

15 **Q: WHAT IS THE COMPANY’S ISRS RATE CAP AS SET BY THE STIPULATION**
16 **IN CASE NO. GR-2025-0107?**

17 A: The ISRS rate cap is \$93,658,424.

18 **Q: WHAT ARE THE COMPANY’S PROPOSED INCREMENTAL ISRS REVENUES**
19 **IN THIS FILING?**

20 A: Spire East’s incremental revenue requirement in this proceeding, including the *pro forma*
21 months of November 2025 and December 2025 is \$14,036,781 and Spire’s West revenue
22 requirement in this proceeding, including the *pro forma* months of November 2025 and

December 2025, is \$16,299,922. Spire Missouri will update the revenue requirements when actual costs for November and December 2025 are available.

Q: PLEASE DESCRIBE THE WORKPAPERS AND APPENDICES THE COMPANY HAS PROVIDED IN SUPPORT OF ITS APPLICATION IN THIS CASE.

A: The Company's current filing consists of the supporting appendices and schedules for both Spire East and Spire West. Additionally, concurrently with this filing, Spire Missouri is providing documentation supporting mandated relocations, work order authorization sheets for all ISRS eligible projects included in the filing, Engineering cost analyses and drawings, and models detailing investments captured under blanket work orders for both Spire East and Spire West.

COMPETITIVE BIDDING PROCESS

Q: WHAT ARE THE ISRS COMPETITIVE BIDDING REQUIREMENTS?

A: Section 393.1012.4, RSMo requires that in order for a gas corporation to establish or change an ISRS, it must have developed and filed a pre-qualification process for contractors seeking to participate in competitive bidding to install ISRS-eligible plant. In addition, this section requires that a gas corporation use, "...competitive bidding process for no less than twenty-five (25) percent of the combined external installation expenditures made by the gas corporation's operating units in Missouri."

Q: DOES THE COMPANY HAVE A PRE-QUALIFICATION PROCESS IN PLACE?

A: Yes. Spire Missouri developed and filed its pre-qualification process for contractors with the Commission on April 29, 2021, in Case No. GO-2021-0382.

1 **Q: HAS THE COMPANY COMPEITIVELY BID NO LESS THAN TWENTY-FIVE**
2 **PERCENT OF ITS COMBINED EXTERNAL INSTALLATION EXPENDITURES**
3 **FOR ITS ISRS ELIGIBLE PROJECTS?**

4 A: Yes.

5 **Q: PLEASE BRIEFLY DESCRIBE HOW THE COMPANY DETERMINDED THAT**
6 **IT MET THE TWENTY-FIVE PERCENT THRESHOLD?**

7 A: The Company's West service territory uses contractors for ISRS installations, while its
8 East service territory does not. Therefore, the calculation surrounding the twenty-five
9 percent threshold is solely based on Spire West. All ISRS projects for Spire Missouri West
10 that are completed utilizing a contractor for installation are tracked by Operations
11 Analytics. Those projects are then identified as Competitive Bid projects or non-bid
12 projects. The Competitive Bid project bucket total is then divided by the total installation
13 bucket which results in the Competitively Bid percentage. This calculation is detailed in
14 Schedule TEL-D1 of my testimony.

15 **Q: DOES THE COMPANY ANTICIPATE USING CONTRACTORS IN ITS EAST**
16 **SERVICE TERRITORY?**

17 A: At this time, Spire is not utilizing contractors to complete ISRS-eligible projects within its
18 East service territory. However, the Company reserves the right to seek contractors for
19 ISRS-eligible projects in the east service territory in the future.

20 **INCREMENTAL COSTS**

21 **Q: HOW IS THE COMPANY TREATING INCREMENTAL COSTS IN THIS**
22 **FILING?**

1 A: Spire Missouri remains consistent in the treatment of incremental costs. The Engineering
2 Department provides its analyses and any incremental costs associated with the
3 replacement of the interspersed facilities is removed from the ISRS application and
4 recovery is not sought.

5 **LEAK ELIGIBILITY UNDER BLANKET WORK ORDERS**

6 **Q: IS THE COMPANY REMAINING CONSISTENT WITH THE PAST**
7 **METHODOLOGY TO IMPROVE LEAK ELIGIBILITY?**

8 A: Yes. The Company included the new query field within the Blanket Work Order model in
9 case nos. GR-2025-0026 and GR-2025-0206. During those cases, no questions or concerns
10 regarding the change in eligibility for leaks arose.

11 **STIPULATED ITEMS FROM CASE NO. GR-2025-0107**

12 **Q. IN CASE NO. GR-2025-0107, WERE THERE ANY ITEMS RELATING TO ISRS**
13 **IN THE APPROVED FULL AND UNANIMOUS STIPULATION AND**
14 **AGREEMENT?**

15 A. Yes. Items #6 and #29 of the Full and Unanimous Stipulation and Agreement are directly
16 related to Spire's ISRS.

17 **Q. PLEASE DESCRIBE ITEM #6 AND HOW SPIRE MISSOURI PLANS TO**
18 **SATISFY THIS REQUIRMENT.**

19 A. Item #6 requires the Company to track interspersed plastic main retirements associated
20 with cast iron and bare steel ISRS replacements. To satisfy this requirement, the
21 Company has modified the retirement query that Asset Management runs relating to all
22 ISRS eligible retirements. The new query indicates, per work order, the retirement
23 material, retirement footage and retirement vintage of both mains and services. The

1 Company has supplied this information to Staff with the initial filing of this current
2 application.

3 **Q. PLEASE DESCRIBE #29 AND HOW SPIRE MISSOURI PLANS TO SATISFY**
4 **THIS REQUIRMENT.**

5 A. Item #29 requires the Company to file an annual report that includes information related
6 to footage of main and service replacements along with the applicable costs and any
7 planned future investments. The Company is actively working with internal departments
8 to develop this reporting, which will be provided annually to Staff, the Office of the
9 Public Counsel, and Consumers Council of Missouri.

10 **Q. ARE THERE ANY OTHER ITEMS FROM CASE NO. GR-2025-0107 THAT**
11 **WILL BE REFLECTED IN THIS FILING?**

12 A. Yes. The Company would note that other items, such as new deprecation rates and
13 updated customer counts, will be reflected within this filing.

14 **CONCLUSION**

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

16 A. Yes, it does.

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

In the Matter of the Application and Petition)
of Spire Missouri Inc. to Change its)
Infrastructure System Replacement Surcharge) Case No. GR-2026-
In its Spire Missouri East and West Service)
Territories)

AFFIDAVIT

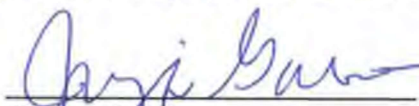
STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

Trisha Lavin, of lawful age, being first duly sworn, deposes and states:

1. My name is Trisha Lavin. I am a Senior Regulatory Analyst for Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri, 63101.
2. This affidavit is attached to my direct testimony, which is filed on behalf of Spire Missouri Inc.
3. I hereby swear and affirm that my answers to the questions contained in my testimony are true and correct to the best of my knowledge, information, and belief.


Trisha Lavin

Subscribed and sworn to before me this 20th day of November 2025.


Notary Public



	May-Oct	Nov	Dec	Forecast	Total
Contractor	\$ 19,893,274	\$ 4,590,319	\$ 8,014,779	\$ 12,605,097	\$ 32,498,371
Competitive Bid	\$ 16,809,378	\$ 3,488,157	\$ 1,479,391	\$ 4,967,547	\$ 21,776,926
Competitive Bid %	45.8%	43.2%	15.6%	28.3%	40.1%