

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

In the Matter of the Application of Spire)
Missouri Inc. for a Variance from)
Standards of Quality Rule.) Case No. GE-2026-XXXX

**APPLICATION FOR VARIANCE FROM STANDARDS OF QUALITY RULE,
REQUEST FOR WAIVER FROM 60-DAY NOTICE RULE,
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), and, pursuant to Missouri Public Service Commission (“Commission”) Rules 20 CSR 4240-2.060(1) and (4), and 20 CSR 4240-2.205, respectfully submits this Application for a variance from the Standards of Quality Rule for renewable natural gas (“RNG”) delivery temperature, specifically 20 CSR 4240-10.030(10)(J). Additionally, pursuant to Commission Rule 20 CSR 4240-4.017(1)(D), the Company requests a waiver from the notice provisions of Rule 20 CSR 4240-4.017(1), and, pursuant to 20 CSR 4240-2.080(14), the Company moves for expedited treatment. In support of these requests, Spire Missouri respectfully 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. A Certificate of Good Standing evidencing Spire Missouri’s standing to do business in Missouri is filed in Case No. GF-2025-0053 and incorporated herein by this reference. The information on such Certificate is currently applicable and correct.

2. Spire Missouri is primarily engaged in the business of distributing and transporting natural gas to customers in both the eastern and western portions of the State of Missouri, subject to the jurisdiction of the Commission. Spire Missouri serves customers in the City of St. Louis and ten counties in Eastern Missouri through its Spire East operating unit. Spire Missouri serves

customers in the City of Kansas City and thirty counties in Western Missouri through its Spire West operating unit.

3. Other than cases that have been docketed at the Commission, Spire Missouri has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involves customer service or rates.

4. Spire Missouri is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is 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
St. Louis, Missouri 63101
(314) 342-3336
Eric.Bouselli@Spireenergy.com

6. Attached to this filing is the Affidavit of Todd True, Project Manager III, Project Engineering, Spire Missouri Inc., asserting that the information contained in the Application is true and correct to the best of his knowledge and belief.

BACKGROUND

7. Following the passage of Section 386.895, RSMo, the RNG enabling legislation, Spire Missouri began receiving interconnection requests from RNG developers. In engaging the developers, the Company assembled and provided an RNG gas quality specification sheet, which was based on the gas specification sheets of the pipelines from which Spire Missouri sources natural gas for its customers. The delivery temperature range on Spire Missouri's sheet was between 40°F and 120°F, which reflects the 120°F maximum delivery temperature requirement of

Enable Mississippi River Transmission (“MRT”), Panhandle Eastern Pipe Line Company (“PEPL”), Rockies Express Pipeline (“REX”), Southern Star Central Gas Pipeline (“Southern Star”), and the Spire MoGas Pipeline (“MoGas”). Spire Missouri’s RNG specification sheet was provided with its comments in File No. GW-2022-0060, submitted on September 18, 2023.

8. On May 26, 2022, Spire Missouri entered into an interconnection agreement with ** [REDACTED] **, which was subsequently acquired by ** [REDACTED] **. The developer designed, procured, and constructed its RNG upgrade systems to meet the provided specifications. During the development of the project, the Commission promulgated RNG gas quality rules under 20 CSR 4240-10.030. This included a maximum delivery temperature of 100°F.

9. ** [REDACTED] ** is anticipating being ready to inject into Spire Missouri’s distribution system in the second quarter of calendar 2026, potentially as soon as April 15, 2026. The facility was designed and approved for a maximum delivery temperature of 120°F, however, the actual normal delivery temperature is unknown until the plant is operational. The temperature will not exceed 120°F, however, based on the project design, may be above 100°F.

10. **Exhibit A**, attached to this application, provides a diagram of the interconnection to our distribution system as well as specifications for the steel piping involved in the interconnection. This Exhibit is confidential pursuant to 20 CSR 4240-2.135(2)(A) 7 as it relates to the security of the Company’s facilities.

VARIANCE

11. Spire Missouri is requesting a variance of the Commission’s standard of quality rule for maximum delivery temperature, 20 CSR 4240-10.030(10)(J). Specifically, the Company is requesting a variance to accept and deliver RNG on its system with a maximum delivery

temperature up to 120°F. Spire Missouri's initial request is for the variance to be granted for the present interconnection and all future interconnections involving steel interconnection and distribution piping, however, in the alternative, will accept the variance for just the present interconnection due to the anticipated in-service date of the RNG project.

12. For variances from Commission rules and tariff provisions, Commission Rule 20 CSR 4240-2.060(4) requires the applicable rule or tariff the waiver for which the waiver is sought, good cause for granting the waiver, and the name of any public utility affected by the waiver.

13. Good cause exists for granting the Company's variance request. First, granting this variance will not adversely impact customer or system safety and reliability. The requested variance for a maximum delivery temperature of 120°F is consistent with the standards of interstate pipelines serving the state of Missouri and the quality of gas that the Company is currently delivering to its customers. The variance is only requested for interconnects to Spire Missouri's steel distribution main, which is rated to handle temperatures of the maximum delivery temperature the Company is requesting. Second, there is good cause for granting this variance as it will facilitate RNG development within the state, consistent with the purpose of the RNG-enabling legislation.

14. Spire Missouri will be the only public utility affected by this waiver application.

15. As good cause exists for this variance and the Company will be the only public utility affected by this variance, Spire Missouri respectfully requests the Commission grant this Application.

MOTION FOR EXPEDITED TREATMENT

16. Pursuant to 20 CSR 4240-2.080 (14), the Company moves for expedited treatment, requesting the Commission approve this variance request no later than April 15, 2026.

17. The RNG developer anticipates being ready to inject pipeline quality gas as soon as April 15, 2026. The harm that will be avoided is a delay to the RNG project beginning injection on the date the project is operational. If the Commission acts by the date requested, there will be no negative impact on the Company's customers, distribution system, or the general public if the Commission grants the requested waiver. The variance for the maximum delivery temperature will not comprise the safety or reliability of the Company's system. This pleading was filed as soon as Spire Missouri became aware of the need to file for this variance, as well as collect the information necessary for this Application.

REQUEST FOR WAIVER OF 60-DAY NOTICE

18. Spire Missouri requests a waiver of the Commission's notice rule, 20 CSR 4240-4.017(1) which 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 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.

19. 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 Todd True attached to this Application is a statement that neither the Company nor any person or entity acting on behalf of the Company or its Missouri operating units, 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 for Spire Missouri's request for a variance.

WHEREFORE, Spire Missouri respectfully requests that the Commission grant the Company's Application for a variance from the Standards of Quality Rule 20 CSR 4240-10.030(10)(J), the motion for expedited treatment, and the request for a waiver of the Commission's notice rule, and order 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

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record on this 25th day of March, 2026.

/s/ J. Antonio Arias

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AFFIDAVIT

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

Todd True, of lawful age, being first duly sworn, deposes and states:

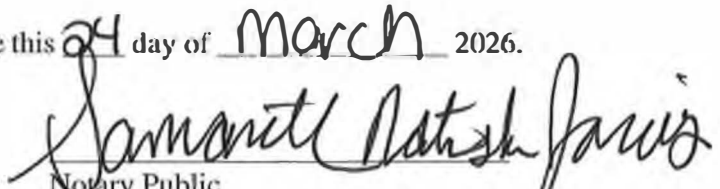
1. My name is Todd True. I am Project Manager III for Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri 63101.
2. I have read the foregoing Application and verify that the matters and things set forth therein are true and correct to the best of my knowledge, information, 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.



Todd True

Subscribed and sworn to before me this 24 day of March 2026.

SAMANTHA NATASHA JARVIS
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES APRIL 29, 2028
ST. LOUIS CITY
COMMISSION #24280747



Notary Public

Exhibit A

CONFIDENTIAL IN ITS ENTIRETY