

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

In the Matter of the Application of Spire                    )  
Missouri Inc. d/b/a Spire for a Variance                )  
from Standards of Quality Rule                            )        **File No. GE-2026-0249**

**UPDATED STAFF RECOMMENDATION**

**COMES NOW**, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Updated Staff Recommendation* states as follows:

1. On March 25, 2026, Spire Missouri Inc. d/b/a Spire (“Spire”) filed its *Application for Variance from Standards of Quality Rule, Request for Waiver of 60-Day Notice Rule, and Motion for Expedited Treatment* (“Application”). Spire requests in its Application: (1) a variance from Commission Rule 20 CSR 4240-10.030(10)(J) on Standards of Quality specifying that renewable natural gas (“RNG”) delivered to customers be at a temperature between 40 degrees Fahrenheit (°F) and 100 °F, (2) a waiver of the 60-day notice requirement of Commission Rule 20 CSR 4240-4.017(1), and (3) expedited treatment of its Application pursuant to Commission Rule 20 4240-2.080(14).

2. Spire’s request is for the variance from Commission Rule 20 CSR 4240-10.030(10)(J) to be granted for the present interconnection and future interconnections; however, Spire expressed a willingness to accept the variance for just the present interconnection.

3. Also on March 25, 2026, the Commission issued an *Order Setting Deadlines for Intervention Applications, Staff Recommendation, and Responses*, which set a March 31, 2026, deadline for applications for intervention,

and an April 3, 2026, deadline for Staff to file either a recommendation regarding Spire's Application or a status report indicating when it expects to file a recommendation.

4. On April 3, 2026, Staff filed its *Staff Recommendation*, in which Staff recommended that the Commission grant Spire's requested variance, subject to five conditions; Staff also outlined, in order to accommodate Spire's request for expedited treatment, a procedure by which Spire could demonstrate that either (A) there will be no detrimental effects of elevated gas temperature on the gas distribution system or (B) that pressure reduction will be needed prior to injection of renewable natural gas into the gas distribution system at elevated gas temperatures.

5. On April 6, 2026, Spire filed its *Response to Staff Recommendation* ("Spire's Response"), in which Spire stated it accepts Staff's five recommended conditions and that it had performed Staff's recommended procedure and provided the results.

6. On April 7, 2026, the Commission issued an *Order Directing Staff Response and Setting Deadline for Other Responses*, which set an April 10, 2026, deadline for Staff to file either an updated recommendation regarding Spire's Application or a request for an extension of time by which to file its recommendation.

7. Staff reviewed Spire's Response, held a discussion with Spire representatives to ask additional questions based on Spire's Response, and requested additional information which was provided by Spire.

8. Staff's Updated Memorandum is attached hereto and incorporated by reference herein. Staff recommends the Commission grant the waiver requested by Spire

for the single project identified in Spire's Application subject to six conditions outlined in Section 3.0 of the Updated Staff Memorandum.

9. Notwithstanding the foregoing, nothing herein shall be deemed as Staff's recommended approval or acquiescence with respect to matters beyond the requested waiver.

**WHEREFORE**, Staff respectfully submits this *Updated Staff Recommendation* and respectfully requests that the Commission accept the same, and for such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

**/s/ Alexandra Klaus**

**Alexandra Klaus**

Senior Counsel

Missouri Bar No. 67196

J. Scott Stacey

Deputy Counsel

Missouri Bar No. 59027

200 Madison Street

P.O. Box 360

Jefferson City, MO 65102

Phone: 573-522-6279

Fax: 573-751-9285

lexi.klaus@psc.mo.gov

**Attorneys for Staff of the**

**Missouri Public Service Commission**

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 10<sup>th</sup> day of April, 2026.

**/s/ Alexandra Klaus**