

<b>Exhibit No:</b>	—
<b>Issue:</b>	<b>Case Overview</b>
<b>Witness:</b>	<b>Trisha E. Lavin</b>
<b>Type of Exhibit:</b>	<b>Direct Testimony</b>
<b>Sponsoring Party:</b>	<b>Spire Missouri Inc.</b>
<b>Case Nos.:</b>	<b>GR-2026-</b>
<b>Date Prepared:</b>	<b>May 19, 2026</b>

**SPIRE MISSOURI INC.**

**GR-2026-**

**DIRECT TESTIMONY**

**OF**

**TRISHA E. LAVIN**

**MAY 19, 2026**

**TABLE OF CONTENTS**

**PURPOSE** ..... 4

**FILING OVERVIEW AND APPENDICES** ..... 4

**COMPETITIVE BIDDING** ..... 8

**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 Analyst, Regulatory Affairs at Spire Missouri Inc.  
6 (“Spire 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, assessment and modeling. I  
11 also assist in the preparation and implementation of Spire Missouri’s, and its Spire East  
12 and Spire West operating units’, regulatory mechanisms, including but not limited to the  
13 Company’s Infrastructure System 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, GR-2025-0206, and GR-  
7 2026-0133.

8 **PURPOSE**

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

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

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 January 1, 2026, through June 30, 2026. 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 Case No. 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 May 2026 and June 2026 is \$10,219,087 and Spire’s West revenue requirement  
22 in this proceeding, including the *pro forma* months of May 2026 and June 2026, is

1 \$11,081,723. Spire Missouri will update the revenue requirements when actual costs for  
2 May and June 2026 are available.

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

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

11 **COMPETITIVE BIDDING PROCESS**

12 **Q: WHAT ARE THE ISRS COMPETITIVE BIDDING REQUIREMENTS?**

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

19 **Q: DOES THE COMPANAY HAVE A PRE-QUALIFICATION PROCESS IN PLACE?**

20 A: Yes. Spire Missouri developed and filed its pre-qualification process for contractors with  
21 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 DETERMINED THAT**  
6 **IT MET THE TWENTY-FIVE PERCENT THRESHOLD?**

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

16 **Q: DOES THE COMPANY USE CONTRACTORS IN ITS EASTERN SERVICE**  
17 **TERRITORY?**

18 A: Historically, the Company has not used contractors in its Eastern Service Territory,  
19 however, Spire has recently started using contractors on ISRS-eligible projects in Spire  
20 Missouri East. For competitive bid projects, Spire has and will utilize the established pre-  
21 qualification process and competitive bid process already approved by the Commission  
22 and utilized in Spire Missouri West, ensuring that the Company will comply with the  
23 twenty-five percent threshold.

1 **INCREMENTAL COSTS**

2 **Q: HOW IS THE COMPANY TREATING INCREMENTAL COSTS IN THIS**  
3 **FILING?**

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

8 **LEAK ELIGIBILITY UNDER BLANKET WORK ORDERS**

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

11 A: Yes. The Company included the new query field within the Blanket Work Order model in  
12 case nos. GR-2025-0026, GR-2025-0206, and GR-2026-0133. During those cases, no  
13 questions or concerns regarding the change in eligibility for leaks arose.

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

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

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

20 **Q. HOW HAS SPIRE MISSOURI SATISFIED THIS REQUIRMENT?**

21 A. Item #6 requires the Company to track interspersed plastic main retirements associated  
22 with cast iron and bare steel ISRS replacements. To satisfy this requirement, the  
23 Company has modified the retirement query that Asset Management runs relating to all

1 ISRS eligible retirements. The new query indicates, per work order, the retirement  
2 material, retirement footage and retirement vintage of both mains and services. The  
3 Company has supplied this information to Staff with the initial filing of this current  
4 application.

5 **Q. HAS SPIRE MISSOURI SATISFIED #29?**

6 A. Yes, the Company filed its first report in January 2026 and has not received any  
7 additional comments or concerns regarding this requirement.

8 **CONCLUSION**

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

10 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 )  
CITY OF ST. LOUIS ) SS

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

1. My name is Trisha Lavin. I am a Senior Analyst, Regulatory Affairs 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 19<sup>th</sup> day of May 2026.

  
\_\_\_\_\_  
Notary Public

TAMMY L. KIRKSEY NOTARY PUBLIC - NOTARY SEAL STATE OF MISSOURI MY COMMISSION EXPIRES NOVEMBER 20, 2028 ST. LOUIS CITY COMMISSION #24459582
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Missouri

	<u>Jan-Apr</u>	<u>May</u>	<u>Jun</u>	<u>Forecast</u>	<u>Total</u>
Contractor	\$ 14,882,635	\$ 10,952,112	\$ 9,182,740	\$ 20,134,852	\$ 35,017,487
Competitive Bid	\$ 4,049,842	\$ 6,750,120	\$ 5,816,947	\$ 12,567,066	\$ 16,616,908
<b>Competitive Bid %</b>	<b>21.4%</b>	<b>38.1%</b>	<b>38.8%</b>	<b>38.4%</b>	<b>32.2%</b>