

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

In the Matter of the Application of Spire )  
Missouri Inc. for a Certificate of Convenience )  
and Necessity to Construct, Install, Own, )  
Operate, Maintain, and Otherwise Control ) File No. GA-2026-xxxx  
and Manage Natural Gas Distribution Systems )  
Throughout the State of Missouri and for Approval )  
to Acquire Natural Gas Assets of Southern Star )  
Central Gas Pipeline, Inc. )

**APPLICATION FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY AND  
APPROVAL OF PURCHASE OF ASSETS, AND REQUEST FOR A WAIVER**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or the “Company”), by and through its undersigned counsel, and, pursuant to Sections 393.170 and 393.190.1 RSMo, and Missouri Public Service Commission (“Commission”) Rules 20 CSR 4240-2.060 and 20 CSR 4240-3.205, submits this application for a certificate of convenience and necessity to construct, install, own, operate, maintain, and otherwise control and manage natural gas distribution systems throughout the state of Missouri and for approval to acquire natural gas assets of Southern Star Central Gas Pipeline, Inc. (the “Application”). Spire Missouri also requests a waiver from the notice provisions of Commission Rule 20 CSR 4240-4.017(1). In support of the Application and request for a waiver, the Company states the following:

**BACKGROUND**

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. Spire Missouri submitted a Certificate of Good Standing evidencing its ability to do business in Missouri in Case No. GF-2025-0053 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. Spire 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 judgements or decisions against it from any state or federal agency or court within the past three years that involve customer service or rates. Spire has no annual report or assessment fees that are overdue.

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

Trisha Lavin  
Senior Analyst, Regulatory Affairs  
Spire Missouri Inc.  
700 Market Street, St. Louis MO 63101  
(314) 934-9838  
[Trisha.lavin@spireenergy.com](mailto:Trisha.lavin@spireenergy.com)

6. Attached is a signed affidavit of Trisha Lavin, Senior Analyst, Regulatory Affairs for Spire Missouri, asserting that all information in this Application is accurate and truthful.

## DESCRIPTION OF TRANSACTION

6. On January 13, 2026, Spire Missouri and Southern Star Central Gas Pipeline, Inc. (“Southern Star”) entered into an Asset Purchase Agreement (“APA”) to transfer ownership of farm tap assets from Southern Star to Spire Missouri. Two subsequent amendments to the APA have been executed on March 16, 2026, and May 5, 2026. Ultimately, the transaction involves the transfer of 60 farm taps from Southern Star to Spire Missouri; Spire Missouri meters and bills 55 of the farm taps, Southern Star meters and bills three of the farm taps, and City Utilities of Springfield (“City Utilities”) meters and bills two of the farm taps. The executed APA and amendments are attached as **Exhibit 1**.<sup>1</sup>

7. Spire Missouri currently has meters in place to serve the 55 domestic customers it bills, and, under firm contract TS26980, Southern Star will continue to transport the natural gas to all 55 domestic meters. The Company’s existing firm transportation service agreement, TS26980, may be amended, as needed, to increase the maximum daily transportation quantity using available unsubscribed capacity and to add new delivery locations that include the farm taps currently metered and billed by Southern Star and City Utilities.

8. After the transaction closes, the Company will coordinate with Southern Star and City Utilities to change over the meters at the addresses of the five domestic farm taps each entity meters and bills. Attached as **Exhibit 2** is a letter of consent from City Utilities agreeing to facilitate meter exchanges for the two farm taps it currently meters and bills.

9. Spire Missouri now seeks a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage and acquire the farm taps that are the subject of this application. Southern Star applied for FERC approval relating to

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<sup>1</sup> Exhibit 1 is confidential pursuant to 20 CSR 4240-2.135(2)(A)6 as it relates to strategies employed in contract negotiations.

the sale of the farm taps it meters and bills in FERC Docket No. CP-26-153 on March 25, 2026. At the time of this filing, FERC has not yet approved Southern Star's application.

### **APPLICATION FOR A CCN AND APPROVAL OF ACQUISITION**

10. Spire Missouri is seeking a certificate of convenience and necessity to provide natural gas service to locations and customers that receive service from the domestic farm taps that are subject of the amended APA and this Application and is requesting the Commission approve the acquisition of the domestic farm taps. Spire Missouri already has a certificate for the areas containing 43 of the 60 farm taps. The remaining 17 farm taps are located within an area in which no utility is certificated to provide service, so Spire Missouri's request is for a CCN to serve these additional areas and acquire the farm tap assets for all 60 service points.

11. The assets and customers that are being transferred are listed in Schedule 1.01(a) and Schedule 1.01(b) of Exhibit 1. The two farm taps and customers that are currently metered and billed by City Utilities are listed in **Exhibit 3**.<sup>2</sup>

12. The legal description of the areas requested to be certificated is attached as **Exhibit 4**. Within Exhibit 4 is a list of the sections, townships, and ranges that contain all domestic farm taps. For convenience, Spire Missouri has also noted which taps are located within currently certificated areas and which fall outside of the Company's existing certificated areas. **Exhibit 5**<sup>3</sup> is a plot map showing the generalized location of the domestic taps.

13. External financing is not necessary for the acquisition of the assets. At closing, Southern Star will be transferring **\*\* [REDACTED] \*\*** to Spire Missouri, which was agreed upon as a result of the analysis of the cost to update the infrastructure of the assets being transferred to Spire Missouri.

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<sup>2</sup> Exhibit 3 is confidential pursuant to 20 CSR 4240-2.135(2)(A)1 as it contains customer-specific information.

<sup>3</sup> Exhibit 5 is confidential pursuant to 20 CSR 4240-2.135(2)(A)1 as it contains customer-specific information.

14. The Company will apply the currently effective rates in Sheet No. 2 and Sheet No. 3.3 for Spire Missouri West Residential customers and Spire Missouri West SGS customers as applicable until such rates may be changed by an approved tariff of Commission Order.<sup>4</sup> As Spire Missouri currently bills 55 domestic taps, there will be no change for those customers upon the approval of this Application.

15. No governmental approvals are required for Spire Missouri to provide service to these customers. These customers already have existing gas service from Southern Star, Spire Missouri, or City Utilities from farm taps on Southern Star's approved pipelines running through the state.

16. Since Spire Missouri already meters natural gas service to the majority of farm taps, no change in its gas supply contracts will be necessary. Since the customers involved are served from farm taps directly connected to Southern Star's interstate transmission pipeline and are not located within reasonable proximity to Spire Missouri West's distribution system, the Company will continue to rely upon Southern Star's pipeline to provide natural gas service to the customers.

17. Commission approval of the requested certificate of convenience and necessity and approval of the acquisition of the domestic farm taps is in the public interest. Spire Missouri is well-qualified to provide natural gas service to the customers served by these farm taps. The Company is the largest natural gas utility in the state of Missouri, and its financial strength and managerial expertise in the gas retail distribution business assures that safe and reliable service will be provided to these customers. This includes Spire Missouri's experience in replacing aging infrastructure, an issue facing a number of these farm tap customers. This will also not impact Spire Missouri's existing customers, as Southern Star is providing a contribution to the Company

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<sup>4</sup> One tap serves a customer in the SGS class.

as part of the transaction. Moreover, Spire Missouri already meters and bills most of the farm tap customers, so there will be a continuity of service to these customers. For these reasons, there is good cause for the Commission to find that approving the certificate of convenience and necessity and acquisition requested in this Application is in the public interest.

### **REQUEST FOR WAIVER FROM 60-DAY NOTICE RULE**

18. 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 the filing of such a 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, the Company has included in the Affidavit of Trisha Lavin 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 requests that the Commission:

1. Waive the notice requirement of 20 CSR4240-4.017(1);

2. Approve this Application for Certificate of Convenience and Necessity to allow Spire Missouri to provide natural gas service to the areas included in Exhibit 4;
3. Approve the acquisition of the domestic farm taps and authorize Spire Missouri to take necessary and appropriate actions to achieve the purposes and commitments contained within the APA, as amended; and
4. Grant such other relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ J. Antonio Arias

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

Brendan J. Kloeppe, MoBar #76341  
Regulatory Counsel  
Spire Missouri Inc.  
700 Market Street, 6<sup>th</sup> Floor  
St. Louis, MO 63101  
(314) 342-0655 (Office)  
Email: Brendan.kloeppe@spireenergy.com

**ATTORNEYS 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 28th day of May, 2026.

/s/ Lissa Payne

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**AFFIDAVIT**

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

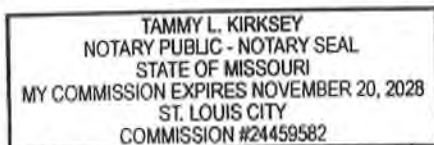
Trisha Lavin, of lawful age, being first duly sworn, deposes and states:

1. My name is Trisha Lavin. I am Senior Regulatory Analyst 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.

  
\_\_\_\_\_  
Trisha Lavin

Subscribed and sworn to before me this 28<sup>th</sup> day of May 2026.

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



This Exhibit is Confidential pursuant 20 CSR 4240-2.135(2)(A)6



Spire Missouri Inc.  
700 Market Street  
St. Louis, MO 63101

April 30, 2026

Dwayne Fulk  
President-CEO  
City Utilities of Springfield  
P.O. Box 551  
Springfield, Missouri 65801

**RE: City Utilities Agreement to Facilitate Meter Exchange**

Dear Mr. Fulk,


Spire Missouri Inc. (“Spire”) and Southern Star Pipeline Inc. (“Southern Star”) have entered into an agreement under which Southern Star will transfer its farm tap assets to Spire. At present, City Utilities of Springfield (“City Utilities”) meters and bills the following addresses served by farm taps that Southern Star will transfer to Spire:

- XX
- XX

It is our understanding that City Utilities has agreed to work with Spire to perform meter exchanges at each of the addresses, in which City Utilities will remove its existing meters, and Spire will install meters of its own, so that Southern Star can transfer the farm taps assets serving the three addresses to Spire. A date and time for the exchanges will be agreed upon once the transaction is completed. After the exchanges, City Utilities will no longer bill the addresses for natural gas service.

Please sign the below acknowledgement that City Utilities agrees to engage with Spire to perform the meter exchange required so that Southern Star may transfer the associated farm tap assets to Spire.

**Acknowledgement of agreement to exchange meters with Spire at the above listed addresses given this 30th day of April, 2026 by:**

**City Utilities**  
 By   
Dwayne Fulk (Emp #19-27-29 CDT)  
 Name Dwayne Fulk  
 Title President-CEO

  
**City Utilities Legal Department**

Sincerely,

*/s/ J. Antonio Arias*

J. Antonio Arias  
Director, Associate General Counsel - Regulatory  
314-342-0655  
antonio.arias@spireenergy.com

This Exhibit is Confidential pursuant 20 CSR 4240-2.135(2)(A)1

<b>County</b>	<b>Coordinates</b>	<b>Certification Notes</b>
Barry	T23NR28WS34	
Cass	T45NR30WS02	
Cass	T45NR30WS07	
Cass	T45NR30WS12	Certification Needed
Cass	T45NR30WS18	
Cass	T45NR30WS19	
Cass	T45NR31WS22	
Cass	T45NR31WS24	Certification Needed
Cass	T45NR31WS24	Certification Needed
Cass	T45NR32WS25	
Cass	T46NR30WS02	Certification Needed
Cass	T46NR30WS22	Certification Needed
Cass	T46NR30WS02	Certification Needed
Cass	T46NR30WS03	Certification Needed
Cass	T46NR30WS19	
Cass	T46NR30WS35	
Christian	T27NR24WS10	
Greene	T28NR23WS13	Certification Needed
Greene	T28NR24WS14	Certification Needed
Jackson	T47NR30WS24	
Jackson	T47NR30WS34	
Jackson	T48NR30WS11	
Jackson	T48NR30WS11	
Jackson	T48NR30WS14	
Jackson	T48NR30WS26	
Jasper	T28NR34WS12	
Jasper	T28NR33WS15	
Jasper	T28NR33WS18	
Jasper	T28NR33WS23	
Jasper	T28NR33WS25	
Johnson	T45NR27WS05	Certification Needed
Lawrence	T26NR26WS03	
Lawrence	T26NR27WS02	Certification Needed
Lawrence	T26NR27WS08	
Lawrence	T26NR28WS03	
Lawrence	T26NR28WS04	
Lawrence	T27NR25WS25	
Lawrence	T27NR25WS26	
Lawrence	T27NR25WS28	Certification Needed
Lawrence	T27NR25WS31	
Lawrence	T27NR25WS32	
Lawrence	T27NR25WS34	
Lawrence	T27NR28WS33	Certification Needed

McDonald	T21NR32WS08	
McDonald	T22NR32WS07	
McDonald	T23NR32WS07	
McDonald	T23NR32WS18	
Newton	T24NR33WS25	
Newton	T25NR32WS17	
Newton	T26NR29WS01	
Newton	T26NR29WS03	
Newton	T26NR30WS06	
Newton	T26NR32WS05	
Newton	T26NR32WS13	Certification Needed
Newton	T26NR32WS24	
Newton	T26NR32WS31	Certification Needed
Newton	T26NR32WS32	Certification Needed
Newton	T26NR33WS05	
Newton	T26NR34WS01	
Newton	T27NR31WS31	Certification Needed

This Exhibit is Confidential pursuant 20 CSR 4240-2.135(2)(A)1