

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

In Matter of the Proposed Amendments	)	
And Proposed Recission of the	)	Case No. OX-2026-0334
Commission's Rules Relating to	)	
Chapter 3 - Filing Requirements	)	

**SPIRE MISSOURI'S COMMENTS ON PROPOSED
RULE CHANGES TO CHAPTER 3 – FILING REQUIREMENTS**

COMES NOW Spire Missouri Inc. (“Spire” or “Company”), by and through undersigned counsel, and hereby files its comments in response to the Missouri Public Service Commission’s (“Commission”) *Notice of Hearing and Comment Period* (“Notice”) on 20 CSR 4240 Chapter 3 (“Proposed Rules”), issued on June 3, 2026, stating the following:

1. On May 27, 2026, the Commission opened a rulemaking docket to promulgate rule changes to Chapter 3 of 20 CSR 4240 regarding filing requirements of regulated utilities.
2. The Proposed Rules were filed with the Missouri Secretary of State on May 29, 2026.
3. On June 3, 2026, the Commission directed written comments regarding the Proposed Rules be filed by July 31, 2026, and ordered a hearing be held on August 5, 2026.
4. Spire Missouri is in support of the objective of the Proposed Rules, which is largely to update Chapter 3 to reference the current and proper sections of 20 CSR 4240, and clarify definitions within Chapter 3.
5. Spire Missouri proposes one change to an updated reference in the Proposed Rules. The proposed amendment to 4 CSR 4240-3.030 adjusts the reference for gas utilities in the *Purpose* section from 4 CSR 240-3.235 to 20 CSR 4240-3.235; however, 20 CSR 4240-3.23 is no longer part of Chapter 3 and therefore cannot be referenced as such. If the intent is to reference additional

filing requirements for a gas utility rate case, the Company proposes amending the reference to 20 CSR 4240-40.085, as it appears in the proposed redline edit below:

PURPOSE: This rule prescribes the information which must be filed by all electric utilities, all large local exchange telecommunications companies, all large gas, water and sewer utilities, and all steam heating utilities when filing for a general company wide increase in rates. Additional requirements regarding this subject matter are also found in 20 CSR 4240-3.160 for electric utilities and ~~20 CSR 4240-3.235 for gas utilities~~ 20 CSR 4240-40.085 for gas utilities.

6. The Company's amendment adheres to the purpose of the present rule changes and is recommended to ensure accuracy of the amended reference. The Company has no further comments on the Proposed Rules at this time.

WHEREFORE, Spire Missouri respectfully requests that the Commission accept these comments and incorporate the Company's proposed amendment.

Respectfully submitted,

/s/ Brendan J. Kloeppel

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent either by mail or electronic mail to all parties of record on this July 31, 2026.

/s/ Brendan J. Kloeppel

Brendan J. Kloeppel