

Exhibit No.:

*Issue(s): Carbon Emissions and
Public Interest*

Witness: Jadon Stafford

Sponsoring Party: MoPSC Staff

Type of Exhibit: Rebuttal Testimony

*Case No.: GA-2026-0121
and GO-2026-0122*

Date Testimony Prepared: July 31, 2026

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

WATER, SEWER, GAS, AND STEAM DEPARTMENT

REBUTTAL TESTIMONY

OF

JADON STAFFORD

SPIRE MISSOURI, INC.

CASE NO. GA-2026-0121

And

CASE NO. GO-2026-0122

Jefferson City, Missouri

July 2026

REBUTTAL TESTIMONY

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JADON STAFFORD

SPIRE MISSOURI, INC.

CASE NO. GA-2026-0121

AND

CASE NO. GO-2026-0122

Q. Please state your name and business address.

A. My name is Jadon Stafford, and my business address is 200 Madison Street, Jefferson City, Missouri 65101.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission ("Commission") as an Economics Analyst in the Water, Sewer, Gas and Steam Department; Industry Analysis Division.

Q. Are you the same Jadon Stafford who contributed to the Staff Recommendation?

A. Yes. I wrote about the promotion of the public interest contained at page 17 of the Staff Recommendation.

Q. Have you previously filed testimony with the Commission?

A. No.

Q. What is your previous work and education experience?

A. My credentials are attached to this direct testimony as Schedule JS-d1.

EXECUTIVE SUMMARY

Q. What is the purpose of your rebuttal testimony?

A. The purpose of this rebuttal testimony is to address portions of the direct testimony of Spire Missouri Inc. (“Spire”) witness Eric Bouselli. The focus of this rebuttal testimony is to present the analysis Staff performed to determine whether Spire has met its burden of promoting the public interest through the reduction in Carbon emission equivalents (“CO₂e”).

CARBON EMISSIONS IMPACTS

Q. Did Spire calculate the emissions reduction estimate?

A. In Eric Bouselli’s Direct Testimony he reports that the construction of the RNG plant (the “Project”) would result in “...avoiding approximately 20,000 tons of CO₂e.”¹ The CO₂e reduction referenced in Bouselli’s testimony was estimated by a third-party consultant on behalf of Kansas City Water.

Q. What was the estimated reduction amount?

A. It was estimated that constructing a renewable natural gas (“RNG”) facility would result in a reduction of 20,000 tons of CO₂e. However, there were assumptions made in the calculation to achieve that result that are potentially impractical.

Q. What are these assumptions?

¹ Bouselli’s direct testimony Page 13, lines 13-14.

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1 A. First, the estimate assumes a maximum flow of ** [REDACTED] ** (cubic feet
2 per minute) for the entire year and not an average flow of ** [REDACTED] **. ² Second, the
3 estimate used a Methane content of ** [REDACTED] **, and not ** [REDACTED] ** as provided by Spire in
4 response to DR 9.

5 Q. Why are these assumptions important?

6 A. Accurate and practical assumptions are important to ensure that the
7 estimates produce a reasonable and reliable result. For example, assuming that a facility
8 is going to operate at the maximum flow rate for an entire year rather than at an average
9 flow rate risks overstating the impacts and would produce an unreasonable result that
10 cannot be relied on.

11 Q. Does substituting the assumptions in the estimate change the result
12 significantly?

13 A. Yes, changing the assumptions to use a flow rate of ** [REDACTED] ** and a
14 methane content of ** [REDACTED] ** results in an estimated reduction of 13,000 tons of CO₂e,
15 a 35% decrease to the original estimate of 20,000 tons of CO₂e.

16 Q. What is the impact of emissions reduction on the surrounding area?

17 A. Initially, Staff looked at the impact of the estimated 20,000-ton CO₂e
18 reduction on two levels. The first was identifying the greater Kansas City region,
19 comprised of multiple counties, and emission levels, which were estimated to be 27.2
20 million metric tons of CO₂e, ³ causing the resulting reduction to have an impact of 0.07%,

² Spire's response to DR 9.0 outlines three flow scenarios, each with unique flow rates and lists 585 cf/min as the average flow.

³ SSG, & Hoxie Collective LLC. (2025, November). *Climate action plan home*. Climate Action Plan. [Kansas City Regional Climate Action Technical Report, November 2025](#)

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1 or seven-hundredths of a percent. Second, Staff looked at the City of Kansas City
2 (“the City”) only, calculating the City emission levels to be 9,551,626⁴ tons of CO₂e,
3 causing the resulting reduction to have an impact of approximately 0.2%, or two-tenths
4 of a percent. The impacts of 0.07% and 0.2% result from using an estimated decrease of
5 20,000 tons of CO₂e.⁵ When using an estimated decrease of 13,000 tons of CO₂e the
6 reduction impacts are approximately 0.05% and 0.14% respectively.⁶

7 Q. How does this Project align with goals of Spire?

8 A. Spire highlighted in its Carbon Offset Initiative case, Case No.
9 GO-2024-0180, that it is committed to becoming carbon neutral. However, in this case,
10 the carbon reductions are specifically a goal for Kansas City; as stated in the contract
11 between Spire and Kansas City, the City has implemented a plan to become carbon
12 neutral by 2040.⁷ The state of Missouri, however, has no such plan.

13 Q. How does Kansas City’s plan affect the public interest?

14 A. The plan for carbon neutrality and having the development of a biogas
15 facility to fulfill said plan should be taken into consideration understanding the Spire
16 customers paying for the actual construction of the Project. Since the cost of
17 constructing and maintaining the Project is planned to be borne by ratepayers that do not

⁴ This an updated number from a 2022 slide deck from the City of Kansas City; *Climate Action*, City of Kansas City, Official Website: [Climate Action | CITY OF KANSAS CITY | OFFICIAL WEBSITE](#) (n.d.), [639112484932670000](#).

⁵ The calculation of 0.07% is from Staff’s Recommendation.

⁶ The 0.05% impact was calculated by dividing 13,000 by 27.2 million and multiplying by 100, the calculation of 0.25 was 20,000 divided by 9,551,626 multiplied by 100, and for the 0.14% impact the calculation was 13,000 divided by 9,551,626 multiplied by 100.

⁷ Appendix 1, page 1, section D, *Climate Action*, City of Kansas City, Official Website: [Climate Action | CITY OF KANSAS CITY | OFFICIAL WEBSITE](#) (n.d.). [KCMO CRP Final September 2022](#), pg. 4.

1 all live in Kansas City, with the purpose of fulfilling a requirement set forth entirely by the
2 City and not the state of Missouri, Staff does not agree that Spire has shown that the
3 Project promotes the public interest for all Spire West customers.

4 **CARBON OFFSET INITIATIVE**

5 Q. What is the Carbon Offset Initiative?

6 A. The Carbon Offset Initiative (“Initiative”) is a voluntary program for Spire
7 customers to mitigate their carbon emissions through the purchase of certain
8 environmental attributes. A notable amount of discussion in the testimony submitted by
9 Spire in the Initiative case⁸ revolved around the prices of environmental attributes,
10 Spire customers’ willingness to pay for such offsets, and the justifications used in setting
11 the ratio of which environmental attributes to purchase. The Initiative first went into
12 effect in January of 2025.

13 Q. What are the environmental attributes?

14 A. The environmental attributes (“EAs”) are the products purchased to offset
15 the carbon emissions produced by Spire customers. In the case of the Initiative the EAs
16 fall into two categories; (1) verified carbon offsets (“VCOs”), which are associated with
17 reduced carbon emissions, and (2) renewable thermal certificates (“RTCs”), which are
18 EAs specifically related to renewable natural gas.⁹ Additionally, RTCs serve as a direct

⁸ Case No. GO-2024-0180.

⁹ Refer to Spire Tariff Sheet R-30.29 for the specific definitions of RTCs and VCOs.

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1 offset to natural gas, so if the program were entirely based on RTCs, then the customers
2 would be replacing their traditional natural gas with renewable natural gas.¹⁰

3 Q. How much of each environmental attribute would the customer purchase?

4 A. Spire structured the Initiative where the initial ratio between VCOs and
5 RTCs was 95% VCOs and 5% RTCs, so customers that voluntarily joined would have more
6 of their money going to VCOs rather than RTCs.¹¹

7 Q. Why was this ratio chosen?

8 A. Spire picked the initial ratio by relying on a survey it had conducted that
9 informed the company of its customers' willingness to pay for the EAs,
10 with approximately 58% of customers willing to pay \$1 or more a month.¹²
11 Additionally, Spire determined that RTCs were much more expensive than VCOs, with
12 RTCs costing approximately \$20-\$25 per MMBtu.¹³ Given the surveyed customer's
13 willingness to pay and the high cost of RTCs, Spire determined that it was best to
14 apportion most of offsets to VCOs. In other words, going entirely with RTCs was too
15 expensive to justify, even without accounting for the customer's willingness to pay,
16 as determined by Spire.

17 Q. How many Spire West customers have enrolled in the Initiative?

18 A. As of December 2025, only two Spire West residential customers have
19 enrolled in the Initiative.¹⁴

¹⁰ Eric Bouselli testimony GO-2024-0180, pg. 8, lines 8-9.

¹¹ Eric Bouselli Testimony GO-2024-0180, pg. 17, line 4.

¹² Eric Bouselli Testimony GO-2024-0180, pgs. 7-8, lines 23-2.

¹³ Eric Bouselli Testimony GO-2024-0180, pgs. 8-9, lines 21-3.

¹⁴ BORD-2026-0645.

CONCLUSION

Q. Has Spire shown that the reduction in CO₂e demonstrates that the RNG facility promotes the public interest?

A. No, it has not. The calculations Spire relied upon to demonstrate a meaningful impact in reducing CO₂e are fraught with poor assumptions, when using Staff's assumptions there is a lower estimated CO₂e reduction which reduces the overall impact. Additionally, the reduction of CO₂e was a goal set out by Kansas City and the burden of fulfillment is falling on the shoulders of all Spire West customers rather than solely the residents of Kansas City. Additionally, the lack of customer interest in the Carbon Offset Initiative shows little appetite to pay higher rates for even modest carbon reductions.

Furthermore, in the Initiative case Spire themselves indicated that pursuing an RNG program to offset carbon emissions was too expensive to be worthwhile. Bouselli's direct testimony for the Initiative case stated the cost of RTCs was \$20-\$25 per MMBtu. In order to circumvent the high cost RTCs Spire added VCOs to the Initiative resulting in Comparatively, the calculations performed by Spire show the average gross cost per MMBtu for the life of the Project to be ** [REDACTED] **¹⁵ and an average net cost per MMBtu for the life of the Project to be ** [REDACTED] **. Without the benefits from sales of environmental attributes the per MMBtu price would be notably higher than the price range had previously determined to be too high for customers to pay. All the information

¹⁵ Gross costs do not include proceeds from sales of environmental attributes (Renewable Identification Numbers, or "RINs").

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1 indicates that Spire has failed to prove that in this case the benefits of reducing CO₂e
2 outweigh the costs, and subsequently Spire failed to show that the reductions meet the
3 burden of promoting the public interest.

4 Q. Does this conclude your direct testimony?

5 A. Yes it does.

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 Approval of a)
Certificate of Convenience and Necessity to) File No. GA-2026-0121
Construct and Operate Renewable Natural)
Gas Infrastructure in Kansas City, Missouri)

In the Matter of the Application of Spire)
Missouri Inc. d/b/a Spire for Approval of a) File No. GO-2026-0122
Renewable Natural Gas Program)

AFFIDAVIT OF JADON STAFFORD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

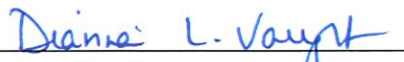
COMES NOW JADON STAFFORD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Rebuttal Testimony of Jadon Stafford*; and that the same is true and correct according to his best knowledge and belief.

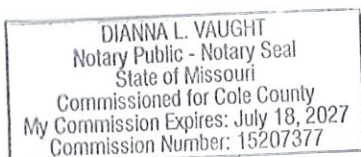
Further the Affiant sayeth not.


JADON STAFFORD

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 30th day of July 2026.


Notary Public



Jadon Stafford

I serve as an Economics Analyst for the Water, Sewer, Gas, & Steam Department, in the Industry Analysis Division of the Missouri Public Service Commission. I have been employed by the Commission since August 11th, 2025. My responsibilities as an Economics Analyst include case management, performing class cost of service studies and rate design, writing testimony, and working with utilities to ensure the promotion of the best practices, the delivery of safe and reasonable service, and doing so at just and reasonable rates.

Educational Background and Work Experience

In June 2022, I received a Bachelor of Science with a major in Economics from the University of Oregon. In June 2024, I received a Master of Science degree in Applied Economics from Oregon State University. I was employed at Oregon State University as a Graduate Teaching Assistant in the Sustainability Program from September 2022 to April 2024. Additionally, I worked as a Graduate Research Assistant at Oregon State University from April 2024 to September 2024.

Previous Testimony Before the Public Service Commission

Recommendation/Memorandum

Case Number	Company	Issue
HT-2025-0280	Evergy Missouri West	Quarterly Cost Adjustment (QCA) 3 rd quarter
HT-2025-0280	Evergy Missouri West	Quarterly Cost Adjustment (QCA) 4 th quarter
WR-2026-0160	Missouri American Water Company	Adjustment to its WSIRA Tariff Rate
HT-2026-0192	Vicinity Energy Kansas City, Inc.	Adjustment to its PACC Tariff Rate