

**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 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.)

Case No. GA-2026-0337

**STAFF RECOMMENDATION FOR APPROVAL OF CERTIFICATE OF
CONVENIENCE AND NECESSITY WITH CONDITIONS**

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Staff Recommendation for Approval of Certificate of Convenience and Necessity with Conditions* states as follows:

1. On May 28, 2026, Spire Missouri Inc. (“Spire”) filed an application seeking a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, and otherwise control and manage a natural gas distribution system to provide gas service to 60 farm taps which Spire has agreed to purchase from Southern Star Central Gas Pipeline, Inc.

2. Also on May 28, 2026, the Commission issued an *Order and Notice* which directed the Commission’s Data Center to provide a copy of the *Order and Notice* to certain county commissions, directed the Commission’s Public Information Officer to make notice of the *Order and Notice* available to the media serving those counties, and set a June 12, 2026, deadline for applications to intervene. No applications to intervene were filed on or before June 12, 2026.

3. On July 8, 2026, the Commission issued an *Order Directing Filing* which directed Staff to file a recommendation or alternative pleading no later than July 23, 2026. Staff filed an *Alternative Pleading, Status Report and Request for Additional Time to File Staff Recommendation* on July 23, 2026, indicating that Staff could file its recommendation by August 24, 2026. On July 27, 2026, the Commission granted Staff's request to file a Staff Recommendation by August 24, 2026.

4. Staff has reviewed Spire's Application and conducted discovery. As more fully explained in Staff's Memorandum, attached hereto as Appendix A and incorporated by reference, Staff is of the opinion that Spire, subject to Staff's proposed conditions, has fulfilled the requirements of Commission Rule 20 CSR 4240-3.205 and the Tartan Criteria upon which the Commission relies in its evaluation of CCN applications. Staff recommends the Commission approve Spire's Application, subject to the conditions stated in the Staff Recommendation Section on page 6 of Staff's Memorandum.

5. Spire's Application contained a request that the Commission waive the 60-day filing notice required by 20 CSR 4240-4.017(1). Spire's Application provided a verified declaration that it had not had communication with the office of the Commission (as defined by 20 CSR 4240-4.015(10)) within the prior 150 days regarding any substantive issues likely to be in the case, and therefore, Staff agrees good cause exists pursuant to 20 CSR 4240.017(1)(D) to waive the 60-day notice requirement.

WHEREFORE, for the reasons stated above and further explained in Staff's Memorandum, Staff recommends the Commission approve Spire's Application for a CCN to acquire natural gas assets of Southern Star Central Pipeline, Inc. as described

in its Application, subject to the conditions set out in the Staff Recommendation Section of Staff's Memorandum, and grant such other and further relief as is appropriate under the circumstances.

Respectfully submitted,

/s/ 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

scott.stacey@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 18th day of August, 2026.

/s/ Alexandra Klaus

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GA-2026-0337 Spire Missouri, Inc.

FROM: Russell Drury – Water, Sewer, Gas & Steam Department
Chad Stephenson, P.E. – Water, Sewer, Gas & Steam Department
Seoung Joun Won, PhD. – Regulatory Compliance Manager, Financial Analysis
Department

/s/ Russell Drury 8/18/2026
Case Manager

SUBJECT: Staff Recommendation for Approval of CCN Application with Conditions

DATE: August 18, 2026

EXECUTIVE SUMMARY

On May 28, 2026, Spire Missouri, Inc. (“Spire Missouri,” “Applicant,” or the “Company”), filed its Application for a Certificate of Convenience and Necessity (“CCN”) and Request for a Waiver (“Application”) with the Missouri Public Service Commission (“Commission”) for permission and approval of a CCN to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system throughout the state of Missouri and for approval to acquire natural gas assets of Southern Star Central Gas Pipeline, Inc. (the “Application” or “Southern Star”). Spire Missouri seeks a waiver from Commission Rule 20 CSR 4240.4.017(1) that provides notice to the secretary of the Commission a minimum of 60 days prior to filing a case.

On May 28, 2026, the Commission issued its *Order and Notice*, setting a deadline for applications to intervene no later than June 12, 2026. No applications to intervene have been filed in this case. On July 8, 2026, the Commission issued its *Order Directing Filing*, setting a deadline of July 23, 2026, for Staff to either file a Recommendation or alternative pleading.

On July 23, 2026, Staff filed an *Alternative Pleading, Status Report and Request for Additional Time to File Staff Recommendation* to conduct further discovery, analyze newly acquired data and information from Spire Missouri, and complete its investigation. On July 27, 2026, the Commission issued its *Order Granting Request for Additional Time* and granted Staff until August 24, 2026, to file its recommendation or alternative pleading.

BACKGROUND OF SPIRE MISSOURI

Spire Missouri is a “gas corporation” incorporated under the laws of the State of Missouri and a “public utility” as those terms are defined in Section 386.020 RSMo., with its principle office located at 700 Market Street, St. Louis, Missouri 63101, and is subject to the jurisdiction and supervision of the Commission as provided by law. Spire Missouri is a Missouri corporation in good standing, as evidenced by a Certificate of Good Standing submitted in prior case, Case No. GF-2025-0053. Spire Missouri is engaged in distributing and transporting natural gas to customers in Missouri, and is currently providing service 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, Christian, Clay, Clinton, Cooper, Dade, Dekalb, Greene, Henry Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Newton, Pettis, Platte, Ray, Saline, Stone, and Vernon.

CASE BACKGROUND

Spire Missouri’s Application states that it seeks a CCN to provide natural gas service to locations and customers that receive service from the domestic farm taps that are the subject of the Asset Purchase Agreement (the “APA”), which Spire Missouri and Southern Star Central Gas Pipeline, Inc. (“Southern Star”) entered into on January 13, 2026, 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. The Application requests the Commission approve the acquisition of the domestic farm taps.

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. Exhibit 4 of the Application contains a list of the sections, townships, and ranges that contain all 60 farm taps. Spire Missouri noted which taps are located within currently certificated areas and which fall outside of the Company’s existing certificated areas (or for which certification is needed).

STAFF’S INVESTIGATION

General Information

Spire Missouri was previously granted a CCN in Case No. GA-2024-0361 for 447 farm taps that were transferred to Spire Missouri from Southern Star, along with all associated facilities. During Case No. GA-2024-0361, Spire Missouri was not aware of the 60 additional taps in the case. Following the conclusion of the docket and closing on the first transaction, Southern Star identified these additional taps and reached out to Spire Missouri for a second possible acquisition transaction.¹

Staff inquired about the infrastructure components replaced, retired, or refurbished for the 447 farm taps in Case No. GA-2024-0361. The work being performed includes rebuilding the existing farm tap from the first high pressure valve; renewing customer-owned service lines if necessary; changing out regulators and reliefs; and installing an Excess Flow Valve if appropriate. Spire Missouri anticipates that the same type of work will be required on the assets included in this case. For the already acquired assets in Case No. GA-2024-0361, Spire Missouri’s Field Operations team has mentioned re-routing service lines around

¹ Company Response to Staff Data Request No. 0022.

structures. No other types of issues related to field conditions have been noted or are expected with the farm taps being acquired in this case.²

Rate and Tariff Matters

The Company will apply the currently effective rates in P.S.C. MO. No. 9, Sheet No. 2 and Sheet No. 3.3 for Spire Missouri West Residential customers and Spire Missouri West Small General Gas Service (“SGS”) customers as applicable until such rates may be changed by an approved tariff of Commission Order. As Spire Missouri currently bills 55 domestic taps, there will be no change for those customers upon the approval of this Application.

Financial Analysis

Staff investigated whether Spire Missouri has the financial ability to construct, install, own, operate, maintain, and otherwise control and manage and acquire the farm taps that transfer ownership of farm tap assets from Southern Star to Spire Missouri (the “Project”).³ Ultimately, the transaction involves the transfer of 60 farm taps from Southern Star to Spire Missouri.⁴

Staff examined the cost of the Project and the financing plan of Spire Missouri. The estimated total project cost of the Project is approximately ** [REDACTED] **. ⁵ Spire Missouri and Southern Star entered into an APA to transfer ownership of farm tap assets from Southern Star to Spire Missouri.⁶ Spire Missouri is transferring

² Company Response to Staff Data Request No. 0020 and 0021.

³ Paragraph 9, The Application.

⁴ 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. Paragraphs 6 and 7, The Application.

⁵ Company Response to Staff Data Request No. 0023.

⁶ Paragraph 6, The Application.

** [REDACTED] . **⁷ According to the Application, external financing is not necessary for the acquisition of the assets.⁸

Considering Spire Missouri's financial capacity, the Applicant has the ability to provide the service. The total cost of the Project is less than 1% of Spire Missouri's total long-term capital.⁹ Spire Missouri will invest approximately \$3 billion during the 2026–2030 period, according to its 5-year capital expenditure plan.¹⁰ Currently, Staff has no concerns regarding Spire Missouri's financial risk profile. According to the Applicant's response to Staff's data request, the Project would not materially affect the Applicant's pro forma financial ratios.¹¹ Spire Missouri is a wholly owned subsidiary of Spire, Inc. Spire Inc.'s targeted 10-year capital expenditure through 2035 is \$11.2 billion.¹² Standard & Poor's ("S&P") and Moody's have assigned investment grade credit ratings to both Spire Missouri and Spire, Inc. S&P assigned a rating of "BBB+" to both companies, while Moody's rated Spire Missouri as "A1" and Spire Inc. as "Baa2" respectively.¹³ Given that the proposed total cost of the Project represents less than 1% of Spire Missouri's average annual capital expenditure, it is reasonable to conclude that Spire Missouri possesses the financial capability to undertake the Project.

Tartan Criteria

It is customary with most cases involving a new CCN for Staff to utilize the Tartan Criteria in order to determine whether a utility's proposal meets the standard of being necessary or convenient for public service. Staff asserts that the use of the Tartan Criteria is appropriate. The Tartan Criteria contemplate: 1) need for service; 2) the utility's

⁷ Company Response to Staff Data Request No. 0005 and Exhibit 1, The Application.

⁸ Paragraph 13, The Application.

⁹ Company Response to Staff Data Request Nos. 0003 and 0005.

¹⁰ Spire Inc. Second quarter fiscal 2026 update, published May 6, 2026.

¹¹ Company Response to Staff Data Request No. 0002.

¹² Slide 6, Spire Inc.'s First quarter fiscal 2026 update, presented February 3, 2026.

¹³ S&P Capital IQ Pro. Retrieved on June 11, 2026.

qualifications; 3) the utility's financial ability; 4) the economic feasibility of the proposal; and 5) promotion of the public interest.¹⁴ Staff details the following regarding the Tartan Criteria:

1. Need for Service

There is a need for service, as these customers are currently receiving gas service. This area has been historically served by Spire Missouri and addresses the need of the project.

2. Utility Qualifications

As previously mentioned, Spire Missouri is currently engaged in providing natural gas services in approximately 40 different counties of Missouri and the City of St. Louis. Spire Missouri is in good standing with the Secretary of State's office, is subject to the jurisdiction of the Commission and holds a franchise to serve in the area requested. Regarding the feasibility of the engineering and operational aspects of the proposal, Spire Missouri has demonstrated over numerous years that it has adequate resources to operate distribution systems it owns.

3. Utility's Financial Ability

As previously mentioned, Spire Missouri is a subsidiary of Spire, Inc., and given that the proposed total cost of the Project is less than 0.1% of Spire Missouri's average capital expenditure, it is reasonable to conclude that Spire Missouri has the financial capability to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system to provide gas service for the Project.

4. Economic Feasibility of the Proposal

As noted earlier, no external financing will be needed to complete the construction related to this project. Staff is of the opinion that Spire Missouri's revenues will continue to be

¹⁴ *In Re Tartan Energy*, GA-94-127, 3 Mo.P.S.C.3d 173, 177 & 189 (1994) (citing *In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. at 561).

sufficient to cover the company's cost of service. Spire Missouri has demonstrated it has access to sufficient capital to construct, install, own, operate, maintain, and otherwise control and manage a natural gas distribution system in the proposed service area, and it is not expected that such a relatively small investment will cause a financial burden for Spire Missouri. Spire, Inc. has demonstrated it can provide the necessary support for Spire Missouri to own, operate, maintain, and otherwise control and manage natural gas distribution systems. Staff's position is that the proposal appears to be economically feasible.

5. Promotion of the Public Interest

Due to the positive nature of the preceding criteria, this proposed acquisition promotes the public interest. Spire Missouri has already been serving farm tap customers in the requested area. It is Staff's position that granting the CCN with conditions is reasonable.

OTHER ISSUES

Spire Missouri is current on its natural gas PSC assessment payments, and is current on its annual reports, and is in good standing with the Secretary of State's office. Spire Missouri has no proceeding before the Commission that should impact the outcome of this case.

Staff Recommendation

Based on the information provided above, Staff recommends the Commission approve the Company's requested CCN with the following conditions:

1. Spire Missouri shall file an updated tariff sheet incorporating the apportioned area.
2. Spire Missouri shall work with the Staff of the Water, Sewer, Gas and Steam Department to provide digital mapping data in a shapefile format for the areas not currently inside of Spire Missouri's existing certificated areas within 30 days after the effective date of an order from the Commission approving this CCN.

3. Spire Missouri shall track all revenues, investments, and expenses directly related to the Asset Purchase Agreement and any future additions or removal of the Farm Tap. These items must be recorded to a separate account or subaccounts, to the extent practical, separately by facility starting with the in-service date for the facility. Spire Missouri shall prepare, in support of the current and future general rate case, an analysis using reasonable allocation methods for those categories of expense where it is not practical to specifically track the transactions in the general ledger.

4. Spire Missouri shall hold ratepayers receiving service outside of the requested CCN area harmless from any expenses and capital investment impacts in excess of billed non-gas revenues.¹⁵

¹⁵ The calculation of billed non-gas revenues should also exclude infrastructure system replacement surcharge (ISRS) revenues.

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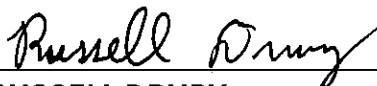
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State of Missouri and for Approval to Acquire Natural)
Gas Assets of Southern Star Central Gas Pipeline, Inc.)

AFFIDAVIT OF RUSSELL DRURY

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW RUSSELL DRURY, and on his oath states that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

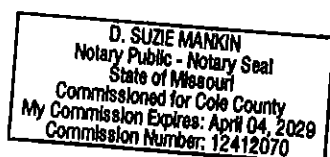
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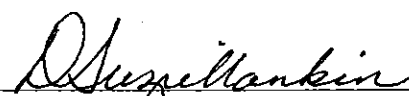


RUSSELL DRURY

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 17th day of August 2026.





Notary Public

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

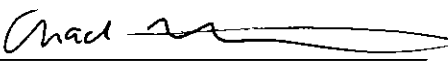
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AFFIDAVIT OF CHAD STEPHENSON, PE

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

COMES NOW CHAD STEPEHEN, PE, and on his oath states that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to his best knowledge and belief.

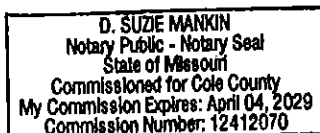
Further the Affiant sayeth not.


CHAD STEPHENSON, PE

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 17 day of August 2026.


Notary Public



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STATE OF MISSOURI)
COUNTY OF COLE) ss

Further the Affiant sayeth not.


SEUNG JOUN WON, PhD

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 17th day of August 2026.


Notary Public

