

**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-2026-0337
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.	)	

RESPONSE TO STAFF’S RECOMMENDATION

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), by and through undersigned counsel, and respectfully submits this *Response to Staff’s Recommendation* (“Response”) to the Missouri Public Service Commission (“Commission”) stating the following:

1. On May 28, 2026, Spire Missouri filed an application for Certificate of Convenience and Necessity to acquire, install, operate and otherwise control and manage a natural gas distribution system providing service to 60 farm taps Spire Missouri agreed to purchase from Southern Star Central Gas Pipeline, Inc. (“Application”) and Request for Waiver of the 60-Day Notice Rule before the Commission.

2. On May 28, 2026, the Commission issued an *Order and Notice* setting a deadline for intervention on June 12, 2026. No applications to intervene were filed on or before June 12, 2026.

3. On July 8, 2026, the Commission issued an *Order Directing Filing*, directing Staff to file a recommendation no later than July 23, 2026.

4. On July 23, 2026, Staff filed an *Alternative Pleading, Status Report and Request for Additional Time to File Staff Recommendation*, which was granted by the Commission on July 27, 2026. The Commission directed Staff to file its recommendation no later than August 24, 2026.

5. On August 18, 2026, Staff filed its recommendation, recommending approval of Spire Missouri's application subject to the conditions that Spire:

- a. Shall file an updated tariff sheet incorporating the apportioned area;
- b. Shall work with 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;
- c. 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 data 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;
- d. 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.

6. Staff additionally recommends approval of the Company's Request for Waiver of Rule 20 CSR 4240-4.017(1).

7. The Company agrees with the Staff Recommendation and accepts Staff's conditions.

WHEREFORE, Spire Missouri respectfully requests that the Commission accept this response, grant the requested CCN as recommended by Staff, and order any other relief as is just and reasonable.

Respectfully submitted,

/s/ Brendan J. Kloeppel

Brendan J. Kloeppel, MoBar# 76341
Counsel - Regulatory
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0658 (Office)
brendan.kloeppel@spireenergy.com

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

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 August 24, 2026.

/s/ Brendan J. Kloeppel

Brendan J. Kloeppel