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SPIRE MISSOURI INC.

CASE NOS.

GA-2026-0121 & GO-2026-0122

SURREBUTTAL TESTIMONY

OF

SCOTT A. WEITZEL

SEPTEMBER 18, 2026

****Denotes Confidential Information****

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SURREBUTTAL TESTIMONY OF SCOTT A. WEITZEL

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Scott A. Weitzel, and my business address is 700 Market Street, St. Louis, Missouri 63101.

Q. WHAT IS YOUR PRESENT POSITION?

A. I am the Vice President of External Affairs for Spire Missouri Inc. ("Spire Missouri" or the "Company").

Q. PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.

A. I have been in external affairs since I joined Spire Missouri in August 2016. I was promoted to my current position in November 2024. In this role, I am responsible for regulatory strategy and engagement, legislation, government affairs, external affairs, energy efficiency, and business and economic development for Spire Missouri. I have held previous roles for Spire Missouri as Vice President Regulatory and Governmental Affairs, Managing Director of Regulatory and Legislative Affairs, Director of Rates and Regulatory Affairs, and I also served as the Manager of Tariffs and Rate Administration.

Q. PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL EXPERIENCE PRIOR TO JOINING SPIRE MISSOURI.

A. Upon graduation from college, I was employed by CenterPoint Energy as a Gas Marketing Analyst where I handled billing, nominations, hedge settlement, and account management for commercial, industrial, and municipal gas customers. I then spent nine years working for Ameren Missouri in various roles relating to its gas supply operations. This work

included scheduling gas, peak day planning, capacity and storage planning, gas supply procurement, capacity releases, hedging, gas accounting, responding to data requests, purchased gas adjustment ("PGA") analysis, and review of competitors' tariffs and cases. I then went to work for Ameren Illinois in the area of gas business development where I focused on extending natural gas to communities that were not currently supplied with natural gas and acquiring gas utilities and municipal gas systems.

Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?

A. I graduated from the University of Missouri-Columbia in 2003, with a Bachelor of Science in Human Environmental Sciences, with a major in Consumer Affairs and a minor in Leadership and Public Service. I received my Masters of Business Administration from Webster University in 2007.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION ("COMMISSION" OR "PSC")?

A. Yes, I have testified in connection with File Nos. GR-2017-0215, GR-2017-0216, GO-2019-0058, GO-2019-0059, GO-2022-0171 GU-2019-0011, GU-2020-0376, GR-2021-0108, GC-2021-0315, GC-2021-0316, GC-2021-0353, GR-2022-0179 and GR-2025-0107.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to respond to the rebuttal testimony of Missouri Public Service Commission Staff ("Staff") witnesses Keith Majors, Jadon Stafford and David M. Sommerer, as well as Office of the Public Counsel ("OPC") witnesses Angela Schaben and Jill Wade in support of the Company's Application (Case No. GA-2026-0121) for a Certificate of Convenience and Necessity ("CCN") for a renewable natural gas ("RNG")

generation facility at the City of Kansas City ("City") Blue River Waste Water Treatment Plant ("Blue River WWTP"), interconnection, and pipeline to Spire Missouri's existing distribution infrastructure ("CCN Application"), as well as the Application for its renewable natural gas program ("RNG Program Application"), which includes the same infrastructure that is the subject of the CCN Application. I address Spire Missouri's response to legislation on RNG, prudency of the project, the avoided cost of gas and the average net cost of gas over the life of the project, activity in Kansas City, the legacy CCN process and this new RNG CCN process, along with the *Tartan* criteria.

II. LEGISLATION

Q. STAFF WITNESS MAJORS DESCRIBES THE ELECTRIC RENEWABLE ENERGY STANDARDS. DID HE MENTION ANYTHING ABOUT THE RNG LEGISLATION?

A. He did not. He was responding to Company witness Bouselli, with Mr. Bouselli highlighting the fact that there are various cost differences in price per MMBtu with electric generation. Mr. Majors implies that since there is legislation with the 15% renewable standard, it is expected to have different generation prices for electrics. What was missing from his testimony is that gas utilities similarly have the ability to build and provide RNG to customers in Missouri through legislation. If Staff feels that legislation allows them to recommend approval of more expensive electric generation than what is in the electric utility generation stack, then they should feel confident that RNG legislation gives them the same policy support from legislators for natural gas supply.

Q. IS THERE A COMPONENT OF THE RNG LEGISLATION (SECTION 386.895, RSMO) YOU FIND SIGNIFICANT?

A. Yes. Section 2, part 2, which provides that the Commission shall adopt: "*Rules for establishing a process for gas corporations to fully recover incurred costs that are prudent, just, and reasonable associated with a renewable natural gas program. Such recovery shall not be permitted until the project is operational and produces renewable natural gas for customer use."*

Q. WHAT STICKS OUT AT YOU ABOUT SECTION 386.895.2(2)?

A. That it calls for a process for gas corporations to "fully recover incurred costs that are prudent, just, and reasonable associated with a renewable natural gas program." (emphasis added).

Q. DID THE COMMISSION PROMULGATE RULES ASSOCIATED WITH RENEWABLE NATURAL GAS PROGRAMS?

A. Yes. The renewable natural gas programs rule is found at 20 CSR 4240-40.100.

Q. DOES 20 CSR 4240-40.100 PROVIDE FOR THE RECOVERY OF COSTS?

A. Yes. In several places it states: "to recover prudently incurred capital costs."

Q. WHAT IS STAFF'S AND OPC'S PRIMARY ISSUE WITH THIS CASE?

A. On page 5 of his Rebuttal Testimony, Staff witness Majors indicates as follows:

> Q. Is it correct to state that the net cost of gas is Staff's primary concern with the project, and consequently a primary reason for recommending the Commission deny Spire Missouri application?
>
> A. Yes.

In OPC witness Wade's rebuttal testimony, she highlights the cost concern (page 15) and then agrees with Staff recommendation (page 16) that the project is not economically feasible.

Q. IF THIS IS A CAPITAL PROJECT APPROVAL CASE, WHY ARE THE PARTIES FOCUSED ON THE COST OF GAS?

A. Because this capital project does produce natural gas, it is understandable that the output of this facility needs to be analyzed in comparison to other gas supply pricing offered to our customers. This appears as the PGA on customer bills.

Q. DOES THE COMMISSION'S RULE REQUIRE A COST BENEFIT ANALYSIS BE PROVIDED IN THE APPLICATION FOR APPROVAL OF RENEWABLE NATURAL GAS PROGRAM?

A. Yes. For example, 20 CSR 4240.100(2)(K)11 requires estimated cost of procuring the same volume of natural gas from a pipeline, including estimated of the price per MMBtu by month for the life of the proposed RNG project.

Q. DOES THE COMMISSION'S RULE OR THE LEGISLATION MENTION ANYTHING ABOUT THE COST OF GAS BEING A DECIDING FACTOR IN RNG PROCEEDINGS?

A. In my review of the rulemaking and legislation, there is no mention of cost of gas as a deciding factor.

III. PRUDENCE

Q. ARE THE LEGISLATION AND COMMISSION RULE CLEAR IN REGARD TO A UTILITY'S RECOVERY OF THE COSTS OF AN RNG PROGRAM?

A. Yes. The legislation states that the utility should "fully recover incurred costs that are prudent," while the Commission's rule echoes this, stating that there shall be the "recovery of prudently incurred capital costs."

Q. HOW HAS THE COMMISSION ADDRESSED PRUDENCE QUESTIONS?

A. The Commission's prudence standard recognizes that a utility's costs are presumed to be prudently incurred, and only after another party to the case casts doubt on prudency, must the utility establish costs as prudent. Moreover, the Commission also looks at whether a utility's decision was reasonable at the time, under the circumstances and information available at the time of such decision. In other words, the Commission assesses whether reasonable people would have made the same decision presented to the utility.

Q. DO YOU FEEL THE COMPANY ACTED PRUDENTLY WHEN IT MADE ITS DECISION IN 2021 AND 2022 TO PURSUE AND EVENTUALLY ENTER INTO A CONTRACT TO BUILD AND OPERATE THE RNG PROJECT?

A. Absolutely.

Q. WHY DO YOU FEEL THE COMPANY ACTED PRUDENTLY?

A. The Company acted prudently at the time the decision was made given the state of the markets and the information it had at the time of execution. When Spire Missouri performed its first economic analysis after an initial engineering design and estimate, the output of the RNG facility was at or below the PGA price for customers. This included a tax credit offset and an environmental attribute, or RIN, market offset given back to customers.

Q. WHY DID THE COMPANY CHOOSE TO ADDRESS THE COST OF GAS IF THE COMMISSION'S RULE AND THE LEGISLATION DO NOT REQUIRE IT TO BE A DECIDING FACTOR FOR APPROVAL?

A. Spire Missouri still wants to be cognizant of any impact or cost to our customers.

Q. HOW DO THE ANALYSES OF THE COST OF GAS OF STAFF DIFFER FROM THE ANALYSIS PERFORMED BY SPIRE MISSOURI WHEN IT DECIDED TO BUILD THE PROJECT?

A. Factors impacting the cost of gas have changed the economics of the project in the past 4-5 years. Company witness Bouselli will discuss these in more detail in his surrebuttal testimony. However, in summary, capital costs have increased since the first engineering design. Another item outside of the Company's control that had significant impact on the economics of the project is the RIN market being at a low point at the time of this proceeding and the recent analysis. An even bigger impact is that broker and offtake fees for the RIN market have nearly quadrupled. These planned credits and offsets have greatly dissipated during this RNG program proceeding. However, like most markets, these conditions can improve in the coming years, especially over the next 20 years.

IV. AVOIDED COST

Q. WHAT HAS THE COMPANY AND STAFF USED AS AVOIDED COSTS IN THIS PROCEEDING?

A. On page 5, lines 2-6, of Staff witness Majors' rebuttal testimony, he states that, "Using Spire Missouri's model inputs, the Average Project Life Gas Cost per MMBtu is **[redacted]**. This is the actual cost of the natural gas entering Spire Missouri system and flowing to customers. The avoided cost of gas used by Spire Missouri is **[redacted]**. The average net cost of gas over the 20-year life of the project is **[redacted]**."

On page 7, lines 9-12, of Staff Witness Majors' rebuttal testimony, Staff uses the approximately same **[redacted]** for their avoided cost.

Q. DO YOU AGREE WITH THE AVOIDED COST ASSUMPTIONS AND APPROACH?

A. I do not. Even though Company witness Bouselli used the approximate ** [redacted] ** as the avoided gas cost assumption in Confidential Appendix 5 attached to the original CCN Application,[1] after evaluating the project from a gas supply and PGA standpoint, Spire West's PGA is a more appropriate avoided cost benchmark. This is because the PGA looks at all natural gas supply and transportation costs that are necessary to supply gas to Missouri customers. These costs are reviewed by Staff, and the Commission approves rates to charge customers for the physical commodity delivery of natural gas. The Company has no "mark up" included in the PGA costs or rates. The main component of the PGA is the current purchased gas adjustment ("CPGA").

Q. IS THE CPGA DEFINED IN TARIFFS?

A. Yes. The CPGA is defined in Sheet No. 11. It states: ""Current Purchased Gas Adjustment (CPGA) - A per Ccf factor to reflect the current estimate of the annualized cost of various natural gas services purchased by the Company, including but not limited to firm and interruptible gas supply, gathering, processing and treating services, firm and interruptible transportation service, storage services, gas supply demand charges, gas price volatility mitigation instruments, including but not limited to financial instruments and any service which bundles or aggregates these various services. Such factor shall also reflect any 'PGA Filing Adjustment Factor' (FAF) as defined in this Section."

Q. WHY SHOULD THE PGA/CPGA BE USED AS AVOIDED COSTS?

[1] Appendix 5 is the Company's original model for the Project. As part of his surrebuttal testimony, Company witness Bouselli is providing a revised Appendix 5 consistent with his surrebuttal testimony.

A. It should be used because it best reflects what a customer in the Spire West service territory would pay and is currently paying for natural gas. This includes all services and costs to get gas to Missouri from production basins several states away and through hundreds of miles of interstate pipelines. The specific costs and services are laid out in the tariff definition above for CPGA.

Q. IS IT HARD TO PREDICT AND FORECAST ENERGY MARKETS, SPECIFICALLY NATURAL GAS 20 YEARS IN THE FUTURE?

A. Absolutely. That is why the Commission has adopted the prudency standard, which evaluates whether the utility made the best decision with the information available at that time. Moreover, that is why the Commission also has promulgated Rule 20 CSR 4240-40.018 concerning natural gas price volatility mitigation and recognizes that part of a natural gas utility's balanced portfolio may be higher than spot market price at times, as a possible result of prudent efforts to dampen upward volatility.

Q. WHAT CAN WE EXPECT THE PGA TO DO OVER THE NEXT 20 YEARS?

A. I do not know. Predicting anything is a challenge. However, what we can do is look at facts, publications, and trends that are impacting interstate pipeline and natural gas markets in order to form an opinion. These two items are big drivers of the PGA/CPGA. Based on those criteria, we can expect the PGA to increase over the next 20 years.

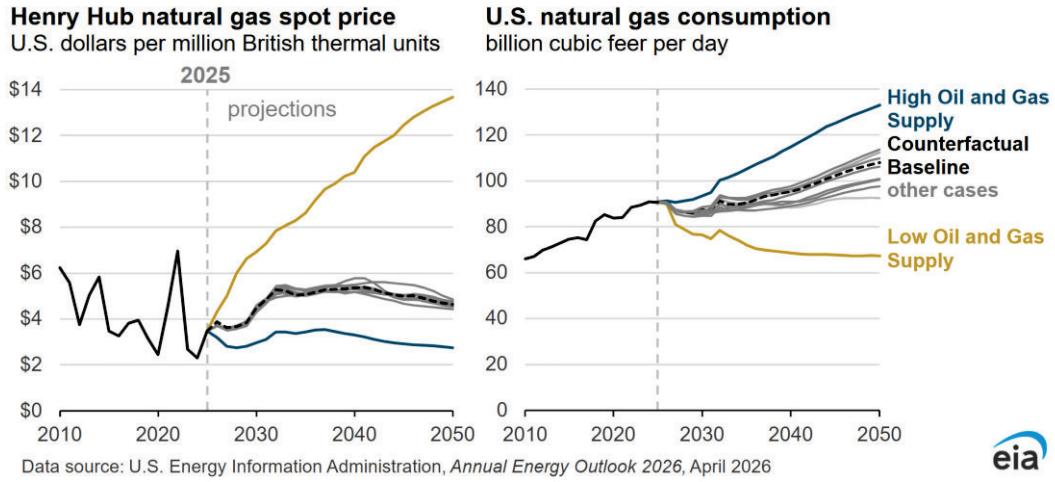
Q. WHAT IS HAPPENING WITH INTERSTATE PIPELINES OVER THE NEXT 20 YEARS?

A. We currently know interstate pipeline rates are increasing. Like utilities regulated by the Commission, interstate pipelines have to go in front of FERC and file rate cases and get rates approved. In many ways, these processes are similar to rate cases for regulated

utilities in Missouri. Southern Star Central Pipeline, the largest pipeline used to supply natural gas to Spire West customers, is currently in a rate case. When new rates become effective this coming winter, we project transportation costs will increase by nearly **[redacted]**. Increasing transportation rates increase our PGA.

Q. WHAT IS EXPECTED TO HAPPEN WITH NATURAL GAS PRICES OVER THE NEXT 20 YEARS?

A. We see prices increasing year over year from 2026 to 2028. We also see the United Staters Energy Information Administration (EIA) increasing its forecasts of natural gas prices. The EIA is showing a large step up in prices over the next 5 years. More immediately, the actual markets traded in September show an increase in price in natural gas as well as forecasts. This also means likely PGA increases in the future. Please see the graphs below:



Q. WHAT IS THE CURRENT PGA FOR SPIRE WEST AND SHOULD THIS BE USED AS AVOIDED COST FOR CONSIDERATION OF THE CCN AND THE RNG PROGRAM?

A. The current PGA for Spire west is $6.7976 per MMBtu. The CPGA is $7.0849. I do not think these exact rates should be used as avoided costs as we know that there will be a PGA increase this upcoming winter, before the RNG plant is operational to account for the Southern Star Pipeline rate case. As I said earlier, this will likely be around ** [redacted] **. Instead of the current PGA, the avoided costs should be analyzed using a blended rate over the next 20 years as the Company and Staff have previously done in their modeling.

Q. WHAT PGA RATE SHOULD BE USED AS THE AVOIDED COST FOR THIS RNG FACILITY?

A. We should start by taking into account that transportation costs will be increasing over the years and markets and experts are calling for an increase in natural gas costs. Accordingly, as a conservative approach to forecasting what a PGA rate may be in the future, we propose simply applying a 3.5% inflation factor to the PGA over the life of the facility. Starting

with a PGA of ** [redacted] **. Using this approach, ** [redacted] ** is the avoided cost rate that should be used for this project. See the below table:

** [redacted] **

Q. DID THE COMPANY LOOK AT OTHER PGA SCENARIOS FOR THE AVOIDED COST INPUT?

A. Yes. The Company ran two other models. Both looked at the individual components of the PGA to include the reservation demand (storage and pipelines) and commodity and volumetric component (cost of gas). The first model took a 3% compounding increase to reservation demand and 1.75% increase to the commodity and volumetric component. This 20-year PGA approach produced approximately a ** [redacted] ** per MMBtu average PGA. The second run took a 6% inflator rate to reservation demand. The Company has seen the West reservation demand increase by about 6% year over year during the past 10 years. Spire Missouri applied a 3% year over year increase to commodity and volumetric components to get a 20-year average natural gas price around $4.55 to get closer to EIA estimates. The second scenario produces approximately a ** [redacted] ** per MMBtu average price over the 20-year life of the project. Performing these two model iterations provides support for the general 3.5% compounding inflation rate to recommend using ** [redacted] ** for the average avoided cost.

Q. WHAT IS THE AVERAGE NET COST OF GAS OVER THE 20-YEAR LIFE OF THE PROJECT?

A. Using Spire Missouri's initial model inputs, the Average Project Life Gas Cost per MMBtu is ** [redacted] **. This is the actual cost of the natural gas entering Spire Missouri system and flowing to customers. The avoided cost of gas used by Spire Missouri is ** [redacted] **. The average net cost of gas over the 20-year life of the project is ** [redacted] **. However, Company witness Bouselli's revised Appendix 5 shows that the average net cost of gas will become negative after incorporating changes discussed in his surrebuttal testimony as well as updating the avoided cost estimate to the projected PGA value I outlined above. This further highlights the economic feasibility benefit of this Project.

Q. HOW DOES THIS COMPARE TO PREVIOUS COMPANY AND STAFF NET COST ANALYSIS?

A. Using the more appropriate Spire West PGA as avoided cost, greatly reduces the net cost. The Company goes from ** [redacted] **.[2] As noted by Staff witness Bouselli, it also does not appear that Staff is factoring in the tax credit for the Project and offsetting cost to customers in its model. If done as Spire Missouri proposes, Staff's ** [redacted] ** will be reduced significantly. This should ease the concerns as to the net cost of gas for the Project.

V. CITY OF KANSAS CITY

[2] This presentation is before the adjustments Company witness Bouselli made to the model initially provided as Appendix 5 to the initial CCN Application. Again, Mr. Bouselli has attached the revised model to his surrebuttal testimony.

Q. **DO YOU AGREE WITH MR. MAJORS REBUTTAL TESTIMONY AT PAGES 11 TO 13 THAT THE CITY OF KANSAS CITY DOESN'T SUPPORT SPIRE'S ONGOING BUSINESS MODEL AS A NATURAL GAS UTILITY?**

A. No. I believe Staff's characterization relies too heavily on selected provisions of the City's Climate Protection and Resiliency Plan ("CPRP") and does not adequately consider the City's actual operations. The Climate Plan establishes broad, long-term climate and emissions reduction goals, including increased electrification in certain applications. While the CPRP establishes greenhouse gas emissions reduction, the City continues to operate within an energy system that includes natural gas.

Q. **DID THE CITY ADOPT THE CPRP AS A RESOLUTION OR ORDINANCE?**

A. The CPRP is a resolution, which is an adopted policy framework, not an ordinance prohibiting natural gas. The City Council expressly adopted it as a framework for achieving climate goals. In adopting the resolution, the Council specifically amended the CPRP to emphasize a portfolio approach that considers customer reliability and affordability, replacing references to "clean electricity" with the broader term "clean energy." Natural gas is widely recognized as a cleaner-burning energy source and can legitimately be part of the broader clean energy portfolio.

Q. **ARE THERE CURRENT EXAMPLES DEMONSTRATING THAT KANSAS CITY CONTINUES TO WORK WITH SPIRE ON ENERGY AND INFRASTRUCTURE INITIATIVES?**

A. Yes. There are several examples where the City continues to work directly with Spire and where natural gas remains part of the City's energy and infrastructure activities.

Q. **CAN YOU PROVIDE A RECENT EXAMPLE?**

A. Yes. Regarding the Blue River WWTP, which is where the Project will be located, KC Water specifically identified its partnership with Spire Missouri on the renewable natural gas facility.[3] This is a significant example because the partnership is occurring while the City's CPRP is in effect. A letter of support was provided in this case, and was approved by the City, which oversees KC Water.[4]

Q. **DOES THE CITY CONTINUE TO ACCOMMODATE SPIRE MISSOURI'S NATURAL GAS DISTRIBUTION INFRASTRUCTURE?**

A. Yes. The City's development and infrastructure activities continue to include coordination with Spire Missouri. The City continues to coordinate street and infrastructure projects with the Company's natural gas infrastructure work.

Q. **WHY IS ALL OF THIS RELEVANT TO STAFF'S CHARACTERIZATION OF THE CITY'S POSITION TOWARD NATURAL GAS?**

A. They provide important context. The City clearly has policies encouraging electrification and reducing greenhouse gas emissions. However, the City's actual activities demonstrate that those objectives coexist with continued natural gas service, modernized infrastructure, and direct collaboration with Spire Missouri.

Q. **WHAT CONCLUSION SHOULD THE COMMISSION DRAW FROM THE CITY'S CURRENT ACTIONS?**

A. The City's actions demonstrate a more diverse energy approach than Staff's characterization suggests. The City is pursuing electrification and emissions reduction

[3] KC Water, *KC Water transforms Blue River Wastewater Treatment plant into state-of-the-art facility*, May 6, 2026, https://www.kcwater.us/news/kc-water-transforms-blue-river-wastewater-treatment-plant-into-state-of-the-art-facility/.
[4] Schedule EAB-D-4.

objectives while simultaneously partnering with Spire Missouri on renewable natural gas, accommodating natural gas services, and coordinating with the Company on infrastructure projects. Those facts should be considered when evaluating claims regarding the City's position toward natural gas. Also, Spire Missouri is very mindful of strategic partnerships that advance natural gas.

VI. CERTIFICATE OF CONVENIENCE AND NECESSITY

Q. DID STAFF WITNESS MAJOR DESCRIBE THE LEGACY CCN CONSIDERATIONS FOR GAS UTILITIES?

A. Yes. He addressed this on page 7 of his rebuttal testimony. He states: "Typical CCN requests involve territory expansions or specific line extensions. These requests typically include a feasibility study not unlike the analysis provided with this application. These territory expansions and line extensions are generally feasible only if there exists a positive rate of return considering all construction costs, cost of capital, and operations and maintenance expenses."

Q. DO YOU AGREE MR. MAJOR'S CHARACTERIZATION OF HOW LEGACY CCN REQUESTS ARE ANALYZED?

A. I do. Legacy gas CCN applications historically involve infrastructure expansion to new communities, subdivision, or commercial customers. The Company provides an economic model that shows the new revenue from the customer(s) will cover the cost of the capital to make sure all other customers are held harmless or not paying for the project. If the economic model does not justify the use of Company capital investment, we require the

customer to make a payment, known as a contribution in aid of construction ("CIAC"), to make the project economical and insulate other customers.

Q. DO YOU AGREE THAT THE LEGACY ANALYSIS SHOULD BE DISPOSITIVE IN THIS PROCEEDING?

A. No. Mr. Majors states, "In contrast, since the RNG system at the Blue River WWTP **[redacted]**."

Using a legacy CCN application process for system expansion with new customers tied to revenue and applying it to a capital project that produces energy is inappropriate and not reflective of the approach for RNG outlined in the legislation or the Commission Rule, 20 CSR 4240-40.100.

Q. WHY IS IT INAPPROPRIATE TO TAKE A LEGACY CCN APPLICATION PROCESS AND APPLY A POSITIVE RETURN THRESHOLD TO THE ANALYSIS?

A. First, we already operate in the area of the RNG facility and have prior CCN authority to serve. Because of the Commission Rule, we were required to file an application for a new CCN specific to the Project. This is similar to how electric utilities must file a CCN application for generation facilities, and similar to the electric generation projects, Staff and the Commission should view the RNG Project as it is, a capital investment that generates energy. The standard that Mr. Majors is applying to the RNG facility, which looks for a positive rate of return, is not the standard for an electric generation facility CCN. There are substantial costs to build and run an energy center to serve native load, in some instances with no new revenue from customers, if those generation facilities are replacing

retired units. A legacy system expansion gas CCN process should not be applied to an energy producing facility that has new filing requirements in 20 CSR 4240-40.100.

VII. *TARTAN* FACTORS

Q. DID STAFF WITNESS MAJOR DISCUSS THE *TARTAN* FACTORS?

A. Yes, on page 8 of his rebuttal testimony.

Q. WHAT ARE THE *TARTAN* FACTORS?

A. The Commission has articulated specific criteria when evaluating applications for utility CCNs as follows:

(1) there must be a need for the service;

(2) the applicant must be qualified to provide the proposed service;

(3) the applicant must have the financial ability to provide the service;

(4) the applicant's proposal must be economically feasible; and

(5) the service must promote the public interest.

Q. WHICH *TARTAN* FACTORS DO STAFF AND OPC BELIEVE ARE NOT MET?

A. They dispute that there is a need for the service, that the proposal is economically feasible, and that the service promotes the public interest.

Q. WHY IS THERE A NEED FOR THIS SERVICE?

A. Spire Missouri West customers need roughly 485,000,000 Ccf of natural gas each year to heat their homes and power their businesses. There is always a need for natural gas in Missouri since Missouri is generally not a natural gas producing state. As a normal course of business, we are short gas each day, month, and year from the demand our customers create. To supply that short position, the Company contracts with producers and marketers

and transports the gas we buy in Oklahoma, Texas, and Kansas through interstate pipelines to our city-gates in Missouri. We will always need natural gas, and this RNG facility will produce a reliable source of natural gas behind the city-gate and directly connected to Spire Missouri's distribution system.

Q. IS THE PROPOSAL ECONOMICALLY FEASIBLE?

A. Yes. As discussed in the avoided cost section of this surrebuttal testimony, this Project is economically feasible. The rate impact to customers is minimal at approximately ** [redacted] ** a month. For the small increase in future base rates, customers are getting the equivalent of zero dollar gas as the gas produced by the Project will immediately go onto to Spire Missouri's distribution system.

Q. DOES THE PROPOSED SERVICE PROMOTE THE PUBLIC INTEREST?

A. I believe so. The Commission has indicated that where the first four *Tartan* factors are met, the public interest is satisfied.[5] Here, there is a need for the service, as the project will generate behind-the-city-gate natural gas supply for our customers. Spire Missouri is qualified to provide the service, as it is an existing, large natural gas distribution public utility and gas corporation, subject to the Commission's jurisdiction. The Company has the financial ability to construct the system, as no external financing is needed. The proposed transaction is economically feasible as there will be a minimal bill impact to customers, and the cost will be recovered through base rates. For these reasons, as well as the environmental benefits from the Project, the proposal promotes the public interest.

VIII. CONCLUSION

[5] *In Re Tartan Energy*, GA-94-127, 3 Mo.P.S.C.3d 173 (1994).

Q. PLEASE EXPLAIN THE COMPANY'S REQUEST IN THESE APPLICATIONS.

A. The Company is requesting the Commission approve its CCN for the Project and its RNG Program incorporating the Project. At this time, the Company is not seeking, and the Commission is not approving, any recovery of the capital investment. For the reasons set forth in Spire's initial filings and in its testimony, it is in the public interest and consistent with the RNG legislation for the Commission to approve the Project. The Company respectfully requests that the Commission approve the CCN and RNG Program applications.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

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 Construct and Operate Renewable Natural Gas Infrastructure In Kansas City, Missouri	)))))	Case No. GA-2026-0121
In the Matter of the Application of Spire Missouri Inc. for Approval of a Renewable Natural Gas Program	)))	Case No. GO-2026-0122

AFFIDAVIT

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

Scott A. Weitzel, of lawful age, being first duly sworn, deposes and states:

1. My name is Scott A. Weitzel. I am Vice President, External Affairs for Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri 63101.

2. This affidavit is attached to my surrebuttal testimony, which is filed on behalf of Spire Missouri Inc.

3. I hereby swear and affirm that my answers to the questions contained in my testimony are true and correct to the best of my knowledge, information, and belief.

Scott A. Weitzel

Subscribed and sworn to before me this 18 day of September 2026.

Notary Public

JENNIFER GARNETT
Notary Public, Notary Seal
State of Missouri
Jefferson County
Commission # 24622547
My Commission Expires 03-31-2028