Exhibit No:	___
Issue:	**Case Overview**
Witness:	**Trisha E. Lavin**
Type of Exhibit:	**Direct Testimony**
Sponsoring Party:	**Spire Missouri Inc.**
Case Nos.:	**GR-2027-**
Date Prepared:	**November 23, 2026**

SPIRE MISSOURI INC.

GR-2027-

DIRECT TESTIMONY

OF

TRISHA E. LAVIN

NOVEMBER 23, 2026

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DIRECT TESTIMONY OF TRISHA LAVIN

Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A: My name is Trisha E. Lavin and my business address is 700 Market St., St. Louis, Missouri, 63101.

Q: WHAT IS YOUR PRESENT POSITION?

A: I am presently employed as a Senior Analyst, Regulatory Affairs at 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 my current position since September 2022. In my position, I am responsible for assisting in many facets of regulatory research, planning, assessment and modeling. I also assist in the preparation and implementation of Spire Missouri's regulatory mechanisms, including but not limited to the Company's Infrastructure System Replacement Surcharge ("ISRS") filings and general rate case filings.

Q: WHAT WAS YOUR EXPERIENCE PRIOR TO ASSUMING YOUR CURRENT POSITION WITH THE COMPANY?

A: I joined Spire Missouri as a Regulatory Analyst in 2018 and prior to that I obtained a bachelor's degree of economics with a minor in international studies from the University of Illinois-Springfield in 2017 and received my master's degree of political science from the same institution in 2019. During the master's program I was a graduate assistant to the Director of the Center for Business and Regulation within the College of Business and Management. In this role, I undertook regulatory research to further understand the relationship between regulators and businesses, as well as assisted in hosting the American

Gas Association Rate Schools in Chicago, Illinois for both the introductory and advanced courses.

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

A: Yes. I have filed testimony in Case Nos. GR-2021-0108, GO-2022-0171, GO-2023-0203, GO-2023-0432, GO-2024-0214, GR-2025-0026, GR-2025-0107, GR-2025-0206, GR-2026-0133, and GR-2026-0316.

PURPOSE

Q: WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A: The purpose of my Direct Testimony is to sponsor Spire Missouri's ISRS application and supporting appendices and to provide a general overview of the Company's ISRS requests for its Spire East and Spire West operating units, discuss the ISRS revenue cap that was set in Case No. GR-2025-0107, briefly describe the Company's competitive bidding process for replacements performed by contractors, and explain the handling of incremental costs. I will also briefly discuss the Company's continued compliance with the Commission's order approving the stipulation reached in Case No. GR-2025-0107, specifically how the inclusion of plastic retirements associated with cast iron and bare steel replacements are tracked and provided in a workpaper for this filing.

FILING OVERVIEW AND APPENDICES

Q: PLEASE PROVIDE A DESCRIPTION OF THE COMPANY'S REQUESTS IN THIS PROCEEDING.

A: The ISRS statutes allow the Company to recover all costs associated with its ISRS eligible projects that help enhance the safety and reliability of our system, including, under § 393.1009(5), RSMo:

> "any cast iron or steel facilities including any connected or associated facilities that, regardless of their material, age, or condition, are replaced as part of a qualifying replacement project in a manner that adds no incremental cost to a project compared to tying into or reusing existing facilities."

In this case, Spire Missouri is requesting recovery of the revenue requirements related to ISRS eligible capital investments made from July 1, 2026, through December 31, 2026. In Case No. GR-2022-0179, the Commission approved a Full Unanimous Stipulation and Agreement ("Stipulation") that included an agreement that there will be a single Spire Missouri Inc. ISRS rate cap, even though the Company will maintain two separate ISRS rates for its Spire East and Spire West operating units. That single Spire Missouri Inc. rate cap was most recently set in Case No. GR-2025-0107.

Q: WHAT IS THE COMPANY'S ISRS RATE CAP AS SET BY THE STIPULATION IN CASE NO. GR-2025-0107?

A: The ISRS rate cap is $93,658,424.

Q: WHAT ARE THE COMPANY'S PROPOSED INCREMENTAL ISRS REVENUES IN THIS FILING?

A: Spire East's incremental revenue requirement in this proceeding, including the *pro forma* months of November 2026 and December 2026 is $9,006,334and Spire's West revenue requirement in this proceeding, including the *pro forma* months of November 2026 and

December 2026, is $12,986,076. Spire Missouri will update the revenue requirements when actual costs for November and December 2026 are available.

Q: PLEASE DESCRIBE THE WORKPAPERS AND APPENDICES THE COMPANY HAS PROVIDED IN SUPPORT OF ITS APPLICATION IN THIS CASE.

A: The Company's current filing consists of the supporting appendices and schedules for both Spire East and Spire West. Additionally, and concurrently with this filing, Spire Missouri is providing documentation supporting mandated relocations and work order authorization sheets for all ISRS eligible projects included in the filing, Engineering cost analyses and drawings, and models detailing investments captured under blanket work orders for both Spire East and Spire West.

COMPETITIVE BIDDING PROCESS

Q: WHAT ARE THE ISRS COMPETITIVE BIDDING REQUIREMENTS?

A: § 393.1012.4, RSMo requires that, for a gas corporation to establish or change an ISRS, it must have developed and filed a pre-qualification process for contractors seeking to participate in competitive bidding to install ISRS-eligible plant. In addition, this section requires that a gas corporation use, "…competitive bidding process for no less than twenty-five (25) percent of the combined external installation expenditures made by the gas corporation's operating units in Missouri."

Q: DOES THE COMPNAY HAVE A PRE-QUALIFICATION PROCESS IN PLACE?

A: Yes. Spire Missouri developed and filed its pre-qualification process for contractors with the Commission on April 29, 2021, in Case No. GO-2021-0382.

Q: HAS THE COMPANY COMPEITIVELY BID NO LESS THAN TWENTY-FIVE PERCENT OF ITS COMBINED EXTERNAL INSTALLATION EXPENDITURES FOR ITS ISRS ELIGIBLE PROJECTS?

A: Yes.

Q: PLEASE BRIEFLY DESCRIBE HOW THE COMPANY DETERMINDED THAT IT MET THE TWENTY-FIVE PERCENT THRESHOLD?

A: Historically, the Company's West service territory uses contractors for ISRS installations, while its East service territory does not. Therefore, the calculation surrounding the twenty-five percent threshold has been solely based on competitively bid ISRS eligible work completed in Spire West. All ISRS projects for Spire Missouri West that are completed utilizing a contractor for installation are tracked by Operations Analytics. Those projects are then identified as Competitive Bid projects or non-bid projects. The Competitive Bid project bucket total is then divided by the total installation bucket which results in the Competitively Bid percentage. This calculation is detailed in Schedule TEL-D1 of my testimony.

Q: DOES THE COMPANY USE CONTRACTORS IN ITS EASTERN SERVICE TERRITORY?

A: While the Company has not historically used contractors in its Eastern Service Territory, Spire recently started using contractors on ISRS-eligible projects in Spire Missouri East. For competitive bid projects, Spire is utilizing the established pre-qualification process and competitive bid process already approved by the Commission and utilized in Spire Missouri West, ensuring that the Company will comply with the twenty-five percent threshold.

INCREMENTAL COSTS

Q: HOW IS THE COMPANY TREATING INCREMENTAL COSTS IN THIS FILING?

A: Spire Missouri remains consistent in the treatment of incremental costs. The Engineering Department provides its analyses and any incremental costs associated with the replacement of the interspersed facilities are removed from the ISRS application and recovery is not sought.

LEAK ELIGIBILITY UNDER BLANKET WORK ORDERS

Q: IS THE COMPANY REMAINING CONSISTENT WITH THE PAST METHODOLOGY TO IMPROVE LEAK ELIGIBILITY?

A: Yes. The Company included the new query field within the Blanket Work Order model in Case Nos. GR-2025-0026, GR-2025-0206, GR-2026-0133 and GR-2026-0316. During those cases, no questions or concerns regarding the change in eligibility for leaks arose.

STIPULATED ITEMS FROM CASE NO. GR-2025-0107

Q. IN CASE NO. GR-2025-0107, WERE THERE ANY ITEMS RELATING TO ISRS IN THE APPROVED FULL AND UNANIMOUS STIPULATION AND AGREEMENT?

A. Yes. Items #6 and #29 of the Full and Unanimous Stipulation and Agreement are directly related to Spire's ISRS.

Q. HOW HAS SPIRE MISSOURI SATISFIED THIS REQUIRMENT?

A. Item #6 requires the Company to track interspersed plastic main retirements associated with cast iron and bare steel ISRS replacements. To satisfy this requirement, the Company has modified the retirement query that Asset Management runs relating to all

ISRS eligible retirements. The new query indicates, per work order, the retirement material, retirement footage and retirement vintage of both mains and services. The Company has supplied this information to Staff with the initial filing of this current application.

Q. HAS SPIRE MISSOURI SATISFIED #29?

A. Yes, the Company filed its first report in January 2026 and did not receive any additional comments or concerns regarding this requirement. Spire will file its next report in January 2027.

CONCLUSION

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application and Petition of Spire Missouri Inc. to Change its Infrastructure System Replacement Surcharge In its Spire Missouri East and West Service Territories	)))))	Case No. GR-2027-

AFFIDAVIT

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

Trisha Lavin, of lawful age, being first duly sworn, deposes and states:

1. My name is Trisha Lavin. I am a Senior Analyst, Regulatory for Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri, 63101.

2. This affidavit is attached to my direct 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.

Trisha Lavin

Subscribed and sworn to before me this 17th day of November 2026.

Notary Public

TAMMY L. KIRKSEY
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES NOVEMBER 20, 2028
ST. LOUIS CITY
COMMISSION #24459582

Missouri West		Jul-Oct	Nov	Dec	Forecast	Total
	Contractor	$ 18,964,826	$ 11,492,855	$ 9,825,087	$ 21,317,941	$ 40,282,768
	Competitive Bid	$ 4,471,757	$ 8,634,402	$ 7,299,685	$ 15,934,087	$ 20,405,844
	Competitive Bid %	**19.1%**	**42.9%**	**42.6%**	**42.8%**	**33.6%**