

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

In the Matter of Spire Missouri, Inc. d/b/a Spire)	<u>File No. GR-2021-0128</u>
(West) Purchased Gas Adjustment (PGA))	Tariff No. YG-2021-0111
Tariff Filing)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its Recommendation, states as follows:

1. On October 30, 2020, Spire Missouri Inc, d/b/a Spire (“Spire West”) filed a proposed tariff sheet bearing an effective date of November 16, 2020. This tariff sheet was filed to reflect changes in Spire West’s Purchased Gas Adjustment (“PGA”) factors as the result of an estimated change in the cost of natural gas for the winter season and changes in the Actual Cost Adjustment (“ACA”) factors.

2. In its *Order Directing Expedited Staff Recommendation and Setting Time for Any Responses to Tariff Filing* (Order), issued November 2, 2020, the Commission directed Staff to file a recommendation regarding the tariff sheet filed by Spire West in Tariff No. YG-2020-0111 no later than November 9, 2020.

3. Although there is no net change in the total PGA rate of \$0.40415, the Current Cost of Gas factor increases to \$0.46743 per Ccf from \$0.44921 per Ccf, an increase of \$0.01822 per Ccf. The ACA factor becomes a larger negative value by \$0.01822 per Ccf, going to (\$0.06328) per Ccf from (\$0.04506). The net change to the PGA rate is zero. These are the rate classes subject to the above PGA: Residential, Small General Service, Large General Service, Unmetered Gas Light, and Large Volume Sales. The rate for Large Volume Transport remains zero.

4. Due to the limited time available to review the documentation supporting the ACA factor in this filing, the Procurement Analysis Department has requested permission to submit the results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2021.

5. For the reasons explained in this Staff Recommendation and Staff Memorandum, attached hereto as Appendix A and incorporated herein, Staff recommends the Commission approve the PGA and ACA factor rates, on an interim basis, subject to refund, pending final Commission decisions in ACA Case Nos. GR-2021-0128 and GR-2020-0122, and to be effective no sooner than November 16, 2020.

WHEREFORE, Staff respectfully requests that the Commission issue an order approving Spire West's tariff sheet in Tariff No. YG-2021-0111, on an interim basis, subject to refund, and to be effective no sooner than November 16, 2020:

PSC MO No. 8

3rd Revised Sheet 11.13, Cancelling 2nd Revised Sheet 11.13, and direct Staff to submit the results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2021.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Missouri Bar No. 51709
Deputy Staff Counsel

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526-7779 (Telephone)
(573) 751-9285 (Fax)
bob.berlin@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 9th day of November 2020.

/s/ Robert S. Berlin

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GR-2021-0128, Tariff No. YG-2021-0111
Spire Missouri Inc., d/b/a Spire (West)

FROM: Michael J. Ensrud, Procurement Analysis Department

/s/ David M. Sommerer 11/09/2020
Financial and Business Analysis Div./Date

/s/ Robert S. Berlin 11/09/2020
Staff Counsel's Office/Date

SUBJECT: Staff Recommendation for Spire Missouri Inc., d/b/a Spire /
Scheduled Winter Season PGA Filing Effective November 16, 2020

DATE: November 9, 2020

On October 30, 2020, Spire Missouri Inc., d/b/a Spire (“Spire West” or “Company”) of St. Louis, Missouri, filed a tariff sheet with an effective date of November 16, 2020 for its Spire Missouri West division. The tariff sheet was filed to reflect scheduled changes in Spire West’s Purchased Gas Adjustment (PGA) factors as the result of an estimated change in the cost of natural gas for the winter season and changes in the Actual Cost Adjustment (ACA) factors.

On November 2, 2020, the Missouri Public Service Commission (“PSC” or “Commission”) issued an **ORDER DIRECTING EXPEDITED STAFF RECOMMENDATION AND SETTING TIME FOR ANY RESPONSES TO TARIFF SHEET**, which directs Staff to file its recommendation by November 9, 2020. The date for any other responses to be filed is also November 9, 2020.

Spire West states the following in its cover letter:

... Spire West’s charges for gas will remain \$.40415 per ccf.

Although there is no net change in the total PGA rate of \$.40415, the Current Cost of Gas factor increases to \$.46743 per Ccf from \$.44921 per Ccf, an increase of \$.01822 per Ccf. The ACA factor becomes a larger negative value by \$.01822 per Ccf, going to (\$0.06328) per Ccf from (\$0.04506). The net change to the PGA rate is zero.

These are the rate classes subject to the above PGA: Residential, Small General Service, Large General Service, Unmetered Gas Light, and Large Volume Sales. The rate for Large Volume Transport remains zero.

OFFICIAL CASE FILE MEMORANDUM

MO PSC Case No. GR-2021-0128

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November 9, 2020

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Case No. GR-2021-0128, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2019-2020 ACA filing. Any rate change implemented pursuant to this tariff filing should be on an interim basis, subject to refund status pending final Commission decisions in ACA Case Nos. GR-2021-0128 and GR-2020-0122.

Due to the limited time available to review the documentation supporting the ACA factor in this filing, the Procurement Analysis Department has requested permission to submit the results and recommendations regarding the information included in this ACA filing to the Commission on or before December 15, 2021. The ACA procedure involves review and true-up to the actual gas costs incurred.

Staff has verified that Spire Missouri, Inc. has filed its annual report, and is not delinquent on its PSC assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing, other than as mentioned above.

Staff has reviewed this filing and has determined it was calculated with conformance with Spire West's PGA Clause. Staff is of the opinion that good cause for approval of this tariff sheet on less than thirty (30) days' notice is demonstrated by Spire West's Commission-approved PGA clause allowing for ten (10) business days' notice for PGA change filings. Staff recommends the Commission issue an order approving the following tariff sheet, filed on October 30, 2020, to become effective on November 16, 2020, on an interim basis, subject to refund pending final Commission decisions in Case Nos. GR-2021-0128 and GR- GR-2020-0122.

PSC Mo No. 8

3rd Revised Sheet 11.13, Cancelling 2nd Revised Sheet 11.13

