BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Missouri, Inc. to Change its Infrastructure) System Replacement Surcharge in its Spire) Missouri East Gas Service Territory	File No. GO-2016-0333
In the Matter of the Application of Spire Missouri,) Inc. to Change its Infrastructure System) Replacement Surcharge in its Spire Missouri) West Gas Service Territory)	File No. GO-2016-0332
In the Matter of the Application of Spire Missouri,) Inc. to Change its Infrastructure System) Replacement Surcharge in its Spire Missouri) West Service Territory)	File No. GO-2017-0201
In the Matter of the Application of Spire) Missouri, Inc. to Change its Infrastructure) System Replacement Surcharge in its) Spire Missouri East Service Territory)	File No. GO-2017-0202

STAFF MOTION FOR A 30 DAY EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion For a 30 Day Extension of Time* (Motion) files its Motion pursuant to the Commission's April 15th *Order Denying Motion to Consolidate, Directing Staff Filing, Setting Time for Responses and Finding Additional Time is Needed for a Commission Decision* (Order), and states as follows:

1. The Commission's Order, in part, directed that Staff "...shall file a verified recommendation that provides for the appropriate calculation of the rate adjustments necessary and the method for providing those rate adjustments..." in the four above-captioned cases remanded to the Commission by the Western District Court of Appeals.

- 2. The Order further provided that any request for an extension of time for Staff to make its filing shall be filed no later than April 24, 2020.
- 3. Due to the need of Staff to analyze and reconsider a tremendous amount of information previously filed in the four remanded ISRS cases (including work orders, work papers, data request responses, and testimony), Staff respectfully requests the Commission grant its Motion for a 30 day extension of time for it to prepare and file its verified calculation for each of the above-captioned ISRS cases.

WHEREFORE, in accordance with the Commission's April 15th Order, Staff respectfully requests that the Commission grant its Motion for a 30 day extension of time from April 30, 2020 to May 30, 2020 to file its verified calculation of rate adjustments in all four above-captioned Spire ISRS cases.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 22nd day of April, 2020, to all counsel of record.

/s/ Robert S. Berlin