

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

In the Matter of the Application of Spire )  
Missouri Inc. to Change its Infrastructure )  
System Replacement Surcharge in its Spire ) **File No. GO-2016-0333**  
Missouri East Service Territory )

In the Matter of the Application of Spire )  
Missouri Inc. to Change its Infrastructure )  
System Replacement Surcharge in its Spire ) **File No. GO-2016-0332**  
Missouri West Service Territory )

In the Matter of the Application of Spire )  
Missouri Inc. to Establish an Infrastructure )  
System Replacement Surcharge in its Spire ) **File No. GO-2017-0201**  
Missouri West Service Territory )

In the Matter of the Application of Spire )  
Missouri Inc. to Establish an Infrastructure )  
System Replacement Surcharge in its Spire ) **File No. GO-2017-0202**  
Missouri East Service Territory )

**SPIRE MISSOURI INC.’S RESPONSE IN SUPPORT OF  
STAFF’S RECOMMENDATION REGARDING ISRS RATE ADJUSTMENTS**

COMES NOW Spire Missouri Inc., on behalf of itself and its two operating units, Spire East and Spire West (“Spire” or “Company”), and submits the following Response In Support of Staff’s Recommendation Regarding ISRS Rate Adjustments, filed in these proceedings on May 15, 2020. In support thereof, Spire states as follows:

1. These cases were remanded from the Western District Court of Appeals for a determination of what refund should be made to customers of the Company in connection with the cost of ineligible incidental plastic mains and services previously included in the Company’s ISRS rates prior to its last general rate case.

2. On May 15, 2020, in compliance with the Commission’s orders, Staff filed its

Recommendation and Report regarding the amount of the refund that should be made to comply with the orders of the Western District Court of Appeals.

3. Spire has performed an independent calculation of the appropriate refund amount, and agrees with Staff's calculation of the proposed refunds as set forth in its May 15, 2020 Recommendation and Report. Spire also agrees with Staff's recommendation of a one-time bill credit as the appropriate method of refund.

4. For all of these reasons, Spire recommends that the Commission enter an Order implementing a one-time bill credit as the appropriate refund to comply with the mandates of the Western District Court of Appeals.

5. Upon the Commission's entry of such an Order, Spire anticipates these cases will be fully and finally resolved.

**WHEREFORE** Spire Missouri Inc. respectfully requests that the Commission accept this Response to Staff's Recommendation and Report of May 15, 2020 and approve an Order consistent therewith.

Respectfully submitted,

/s/ Matthew Aplington,

Matthew Aplington MoBar #58565

General Counsel

Spire Missouri Inc.

700 Market Street, 6<sup>th</sup> Floor

St. Louis, MO 63101

(314) 342-0785 (Office)

Email: [matt.aplington@spireenergy.com](mailto:matt.aplington@spireenergy.com)

/s/ Goldie T. Bockstruck

Goldie T. Bockstruck MoBar#58759

Director, Associate General Counsel

Spire Missouri Inc.

700 Market Street, 6th Floor

St. Louis, MO 63101

314-342-0533 Office (Bockstruck)

314-421-1979 Fax

Email: [Goldie.Bockstruck@spireenergy.com](mailto:Goldie.Bockstruck@spireenergy.com)

**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 26th day of May, 2020.

/s/ Goldie T. Bockstruck