Exhibit No.: Issue(s) Witness/Type of Exhibit: Sponsoring Party: Case No.:

WNAR/Tariff Sheet Mantle/Direct Public Counsel GR-2021-0108

## CLASS COST OF SERVICE DIRECT TESTIMONY

### OF

## LENA M. MANTLE

Submitted on Behalf of the Office of the Public Counsel

# **SPIRE MISSOURI, INC.**

CASE NO. GR-2021-0108

May 26, 2021

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

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)

In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in the Company's Missouri Service Areas

Case No. GR-2021-0108

#### **AFFIDAVIT OF LENA M. MANTLE**

#### STATE OF MISSOURI ) ) ss COUNTY OF COLE )

Lena M. Mantle, of lawful age and being first duly sworn, deposes and states:

1. My name is Lena M. Mantle. I am a Senior Analyst for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my class cost of service direct testimony.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Lena M. Mantle

Senior Analyst

Subscribed and sworn to me this 26<sup>th</sup> day of May 2021.



TIFFANY HILDEBRAND My Commission Expires August 8, 2023 Cole County Commission #15637121

dung

Tiffany Hildebrand Notary Public

My Commission expires August 8, 2023.

#### CLASS COST OF SERVICE DIRECT TESTIMONY

#### OF

#### LENA M. MANTLE

#### **SPIRE MISSOURI, INC.**

#### d/b/a SPIRE MISSOURI EAST & SPIRE MISSOURI WEST

#### CASE NO. GR-2021-0108

#### Q. Would you state your name and business address?

A. My name is Lena M. Mantle and my business address is P.O. Box 2230, Jefferson City, Missouri 65102. I am a Senior Analyst for the Office of the Public Counsel ("OPC").

# Q. Are you the same Lena M. Mantle that filed revenue requirement direct testimony in this case?

A. Yes.

#### Q. What is the purpose of your class cost of service direct testimony?

A. In my revenue requirement direct testimony, I recommended that if Spire provided information that the Commission believes justifies the imposition of an interim rate mechanism on its smallest customers, certain modifications should be made to its current weather normalization adjustment rider ("WNAR"). In this class cost-ofservice direct testimony, I provide tariff language, as provided in the attached schedule LMM-D-3, for the modified WNAR that I recommended in my revenue requirement direct testimony.

# 1Q.How is this tariff language different from the tariff sheets that describe the<br/>current WNAR?

A. One of Spire's "issues" with the current WNAR was that it was more complicated
than it needed to be.<sup>1</sup> When I reviewed the current WNAR tariff sheets, I found
them to be more complicated that they needed to be, so I determined to simplify the
tariff language describing the WNAR. A redline/strikeout comparison of my
proposed tariff language and the current tariff language is attached to this testimony
as Schedule LMM-D-4. The current tariff sheets are attached to this testimony as
Schedule LMM-D-5.

# Q. There is a lot of redline/strikeout on Schedule LMM-D-4. Would you summarize the changes you made to make the WNAR tariff sheets less complicated?

A. The first thing I did to make the tariff language more understandable was to make 13 the font consistent throughout the WNAR tariff sheets. I moved some of the 14 components of the current tariff language to make it clearer. For example, I moved 15 the timing of the filing of new WNAR rates near the beginning. Some of the 16 17 language was not necessary such as the phrase "until such time as it may discontinued or modified by order of the Commission in a general rate case." This 18 19 is statutory and therefore not needed in the tariff sheet. Where the tariff language states a component is set in the general rate case, *i.e.* would not change until the 20 21 next rate case, I propose that the value set in the rate case be on the tariff sheet. 22 Additional explanations for why certain changes were made are included as 23 comments on Schedule LMM-D-4.

Finally, I completely replaced the rate computation with a table that is limited to:

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<sup>&</sup>lt;sup>1</sup> Spire response to OPC data request 8000.

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1		1. The sum of the monthly weather normalization revenue adjustments
2		("ARA");
3		2. The interest on the monthly weather normalization adjustments;
4		3. The true-up amount ("TA");
5		4. The interest on the true-up amount;
6		5. The annual volumetric billing determinants; and
7		6. The WNAR rate.
8		This table is a simple, concise description of the WNAR described in words and
9		equations in the previous language. The table also clearly states the accumulation
10		period (Sum of Weather Revenue Adjustments for June 20XX through May 20XX
11		(ARA)). The title above the table also clearly states the billing months that the
12		WNAR will be charged to customers (Applicable for the billing months of
13		September 20XX through August 20XX).
1 /		Would this tariff language be the same for both Spire East and Spire West?
14	Q.	
15	А.	The verbiage should be the same for both. However, the weather response is
16		different for Spire East and Spire West meaning the beta coefficient ( $\beta$ ) is different
16 17		different for Spire East and Spire West meaning the beta coefficient ( $\beta$ ) is different for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East
17		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East
17 18		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East is 0.1493772 meaning that for every 100 heating degree days of adjustment, the
17 18 19		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East is 0.1493772 meaning that for every 100 heating degree days of adjustment, the difference in usage was 14.9 therms. Using the common conversion of therms to
17 18 19 20		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East is 0.1493772 meaning that for every 100 heating degree days of adjustment, the difference in usage was 14.9 therms. Using the common conversion of therms to Ccf, this would be 15.5 Ccf for 100 heating degree days. For Spire West, the $\beta$
17 18 19 20 21		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East is 0.1493772 meaning that for every 100 heating degree days of adjustment, the difference in usage was 14.9 therms. Using the common conversion of therms to Ccf, this would be 15.5 Ccf for 100 heating degree days. For Spire West, the $\beta$ coefficient is 0.1291586 signifying that 100 heating degree day adjustment would
17 18 19 20 21 22		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East is 0.1493772 meaning that for every 100 heating degree days of adjustment, the difference in usage was 14.9 therms. Using the common conversion of therms to Ccf, this would be 15.5 Ccf for 100 heating degree days. For Spire West, the $\beta$ coefficient is 0.1291586 signifying that 100 heating degree day adjustment would change usage by 12.9 Ccf, approximately 17% less than Spire East.
17 18 19 20 21 22 23		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East is 0.1493772 meaning that for every 100 heating degree days of adjustment, the difference in usage was 14.9 therms. Using the common conversion of therms to Ccf, this would be 15.5 Ccf for 100 heating degree days. For Spire West, the $\beta$ coefficient is 0.1291586 signifying that 100 heating degree day adjustment would change usage by 12.9 Ccf, approximately 17% less than Spire East. In addition, the weather is different for Spire East than it is for Spire West.
17 18 19 20 21 22 23 24		for Spire East and Spire West. In the current tariffs, the $\beta$ coefficient for Spire East is 0.1493772 meaning that for every 100 heating degree days of adjustment, the difference in usage was 14.9 therms. Using the common conversion of therms to Ccf, this would be 15.5 Ccf for 100 heating degree days. For Spire West, the $\beta$ coefficient is 0.1291586 signifying that 100 heating degree day adjustment would change usage by 12.9 Ccf, approximately 17% less than Spire East. In addition, the weather is different for Spire East than it is for Spire West. This means the weather adjustment is also different.

rate (WRVR) would be different for Spire East and Spire West. 3

Class Cost-of-Service Direct Testimony of Lena M. Mantle Case Nos. GR-2021-0108

1	Therefore, while the majority of the tariff language would be the same, there
2	should be different values in the WNAR tariff language for Spire East and Spire
3	West. There could be one set of tariff sheets but the sheets would have to specify
4	different values for these variables. In addition, there would need to be different
5	tables showing the calculation of the WNAR rate for Spire East and Spire West.

# 6 Q. Does this conclude your direct testimony?

A. Yes, it does.

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# WEATHER NORMALIZATION ADJUSTMENT RIDER WNAR

#### APPLICABILITY

The Weather Normalization Adjustment Rider ("WNAR") is applicable to each therm of gas delivered under the terms of the residential rate schedule throughout the entire service area of Spire East. The Rider will be applied as a separate line item on a customer's bill.

The Company will make an annual rate filing with by July 1 to adjust the WNA Rider with an effect date that coincides with the read date of the first September billing cycle. Staff will file its recommendation to the Commission regarding the filing by August 1.

The WNAR rate will remain in effect for the twelve (12) billing months beginning with the September billing month.

#### CALCULATION OF ADJUSTMENT

The Weather Adjustment to Usage ("WAU") will be calculated for each billing cycle and billing month as follows:

WAUi = 
$$\sum_{j=1}^{18} ((NDDij - ADDij) * Cij) * \beta$$

Where:

i	=	the applicable billing month
WAUi	=	Weather Adjustment to usage for the billing month in therms
j	=	the billing cycle
NDD <sub>ij</sub>	=	the total normal heating degree days for billing cycle j in billing month i based upon
		Staff's daily normal weather as determined in the most recent rate case
$ADD_{ij}$	=	the total actual heating degree days, base 65° at St. Louis Lambert International Airport
		Weather Station for billing cycle j in billing month i
$C_{ij}$	=	the total number of customer charges charged in billing cycle j and billing month i
β	=	the coefficient of 0.BBBBB for Spire East

The revenue adjustment ("RA") for each billing month shall be calculated as follows

$$RA_i = WAU_i \times WRVR_i$$

Where

WRVR = the Weighted Residential Variable Rate applicable to the billing month. For the winter billing months (November through April), the WRVR shall be equal to the Residential Winter Charge for Gas Used of \$0.XXXXX. The WRVR for each of the summer billing months (May through October) is the average of the volumetric rates weighted by the number of customers whose usage ends in that block as normalized in the last general rate case. The WRVR for each billing month is reflected in the table below:

May	June	July	August	September	October
\$0.XXXXX	\$0.XXXXX	\$0.XXXXX	\$0.XXXXX	\$0.XXXXX	\$0.XXXXX

#### CALCULATION OF WNAR RATE

The WNAR rate is the Total Recovery Amount ("TRA") divided by ZZZZZZ which is the annual volumetric billing determinants set for the residential rate class in the most recent general rate case.

The Total Recovery Amount ("TRA") is the sum of the Annual Revenue Adjustment ("ARA") and the Trueup Amount ("TA").

The Annual Revenue Adjustment ("ARA") is the sum of the billing month revenue adjustment ("RA") for each of 12 billing months ending with the May billing month.

The True-up Amount ("TA") will be the difference between the revenue billed through the WNAR and the ordered TRA for the recovery period. The revenue billed shall be the actual WNAR revenue billed for the billing months of September through May. The WNAR revenue billed for the billing months of June, July, and August shall be estimated using the volumetric billing determinates for those months as set in the last general rate case. These billing determinants are reflected in the table below:

June	July	August	
DDDDDD	DDDDD	DDDDD	

#### OTHER TERMS

There shall be a limit of \$0.05 per therm on upward adjustments for the WNAR rate and no limit on downward adjustment. Any TRA not recovered due to this cap of \$0.05 per therm will be deferred for recovery from customers in the next recovery period.

Each month, interest at Spire's short-term borrowing rate shall be applied to the Company's average beginning and ending monthly TRA balances. Corresponding interest income and expense amounts shall be recorded on a net cumulative basis for the WNA deferral period.

## WEATHER NORMALIZATION ADJUSTMENT RIDER Currently Effective WNAR

Applicable for the billing	a months of September	20XX through August 20XX
	<b>J</b>	

Sum of Weather Revenue Adjustments for June 20XX through May 20XX (ARA)	\$ XXX,XXX.xx
Interest on Weather Revenue Adjustments (IRA)	\$ X,XXX.xx
True-Up Amount for September 20XX through August 20XX (TA)	\$ X,XXX.xx
Interest on True-Up Amount (I <sub>TA</sub> )	\$ XX.xx
Total Recovery Amount (TRA = ARA + I <sub>RA</sub> + TA + I <sub>TA</sub> )	\$ XXX,XXX.xx
Annual Volumetric Billing Determinants	ZZ,ZZZ,ZZZ
Weather Normalization Adjustment Rider Rate (WNAR Rate)	\$0.00000/Ccf
(TRA ÷ Annual Volumetric Billing Determinants)	

#### WEATHER NORMALIZATION ADJUSTMENT RIDER WNAR

#### APPLICABILITY

The Weather Normalization Adjustment (<u>WNA\*</u>) Rider (<u>WNAR\*</u>) is applicable to each therm of gas delivered under the terms of the residential rate schedule throughout the entire service area of Spire East until such time as it may be discontinued or modified by order of the Commission in a general rate case. The Rider will be applied as a separate line item on a customer's bill.

The Company will make an semiannual rate filing with the Commission 30 days prior to the first effective day referenced in the CSWNA tableby July 1 to adjust the WNA Rider with an effect date that coincides with the read date of the first September billing cycle. Staff will file its recommendation to the Commission regarding the filing by August 1.

The WNAR rateEach CSWNA and SRR will remain in effect for the twelve (12) billing months beginning with the September billing month. The total WNA Rider rate shall be the sum of all effective CSWNAs and SRRs.

#### CALCULATION OF ADJUSTMENT

The WNA Factor Weather Adjustment to Usage ("WAU") will be calculated for each billing cycle and billing month as follows:

WAUi = 
$$\sum_{j=1}^{18}$$
 ((NDDij - ADDij) \* Cij) \*  $\beta$ 

Where:

The revenue adjustment ("RA") for each billing month shall be calculated as follows

1. Monthly WNARAi = WNAUi × Weighted Residential Volumetric Rate ("WRVR")i

#### Where

2. The WRVR = the Weighted Residential Variable Ratea applicable to the billing each month, shall be derived using the billing determinants and residential volumetric rates from the Company's then most recent rate case. For the winter

billing months (November through April), the WRVR shall be equal to the Residential Winter Charge for Gas Used established at the conclusion of each general rate case. For Case No. GR-2017 0215 the amount iso! \$0.23330XXXXX. The WRVR for each of the summer billing months (May through October) shall be determined at the conclusion of each general rate case asig the percentage of total residential customers whose usage ends in the first rate block multiplied by the volumetric rate of that block. Currently effective summeraverage of the

Commented [ML1]: Not needed. When it is discontinued, there will no longer be a tariff sheet. If it is modified, the tariff sheet will be changed.

Commented [ML2]: This isn't a factor. It is usage in

therms. Came up with another abbreviation to lessen

confusion.

Commented [ML3]: There is no such thing as a "billing cycle month." Referred to as billing month in the rest of the tariff sheets.

**Commented [ML4]:** Consistent with weather normalization in rate case. Does not change between rate cases. 5 decimal places to be consistent with rates.

**Commented [ML5]:** While the language will be the same for Spire West, the numbers will be different.

#### Commented [ML6]: Not necessary

Commented [ML7]: Not needed

Commented [ML8]: Can be simplified

LMM-D-4

volumetric rates weighted by the number of customers whose usage ends in that block as normalized in the last general rate case. The WRVR's for each billing month is are reflected in the table below:

May	June	July	August	September	October
\$0.XXXXX2	\$0.XXXXX <del>\$0.</del>	\$0.XXXXX <del>\$0.</del>	\$0.XXXXX\$0.	\$0.XXXXX <del>\$0.</del>	\$0.XXXX\$0.210
1368	21106	21044	21029	21054	96

#### CALCULATION OF WNAR RATE

The WNAR rate is the Total Recovery Amount ("TRA") divided by ZZZZZZZ which is the annual volumetric billing determinants set for the residential rate class in the most recent general rate case.

The Total Recovery Amount (\*TRA\*) is the sum of the Annual Revenue Adjustment (\*ARA\*) and the Trueup Amount (\*TA\*).

3. \_\_\_\_The <u>Annual Revenue Adjustment (\*ARA\*)</u> Current Semiannual WNA (\*CSWNA\*) shall be is the sum of the billing eyele WNAmonth revenue adjustment (\*RA\*) for each of <u>12 billing months ending with the May billing month</u>, the six Monthly WNA for the billing months in the applicable six month period divided by the annual volumetric billing determinants set for the residential rate class in the most recent rate case.

The 4. Semiannual ReconciliationTrue-up Rate Amount (SRTAR). Two (2) months prior to the end of the twelve (12) months of billing of each CSWNA, the over-or-under billing of the numerator of the CSWNA shall be calculated based on ten (10) months actual sales and two (2) months projected sales. The amount of over-or-under billing shall be adjusted as ordered by the Commission, if applicable. The resulting amount shall be divided by the annual volumetric billing determinates set for the residential rate class in the most recent rate case. Two (2) months prior to the end of the twelve (12) months of billing of each SRR, the over-or-under billing of the SRR shall be calculated based on ten (10) months actual sales and two (2) months projected sales. Any remaining over-or-under billing from the SRR shall be applied to the next SRR. The two (2) months projected sales associated with each CSWNA and SSR shall be trued up with actuals upon calculation of the next applicable. SSR. will be the difference between the revenue billed through the WNAR and the ordered TRA for the recovery period

. The revenue billed shall be the actual WNAR revenue billed for the billing months of September through May. The WNAR revenue billed for the billing months of June, July, and August shall be estimated using the volumetric billing determinates for those months as set in the last general rate case. These billing determinants are reflected in the table below:

June	July	August	
DDDDDD	DDDDD	DDDDD	

5. The Company will make a semiannual rate filing with the Commission 30 days prior to the first effective day referenced in the CSWNA table to adjust the WNA Rider. Each CSWNA and SRR will remain in effect for twelve (12) months. The total WNA Rider rate shall be the sum of all effective CSWNAs and SRRs.

#### OTHER TERMS

6. There shall be a limit of \$0.05 per therm on upward adjustments for the WNA<u>R rate</u> and no limit on downward adjustment. Any <u>WNA adjustments amounts</u><u>TRA not recovered in excessible to this cap</u> of \$0.05 per therm will be deferred for recovery from customers in the next <u>WNA adjustmentrecovery period</u>. and applicable to part a. below.

Each month, carrying costs, at a simple rate of interest equal to the prime bank lending rate (as published in The Wall Street Journal on the first business day of such month), interest at Spire's short-term

Commented [ML9]: Does not change between rate cases. Will need to be calculated after billing determinants and rates have been set.

Commented [ML10]: Does not change between rate cases

Commented [ML11]: The font should be consistent across the tariff language

Commented [ML12]: Consistent with statutory language

borrowing rate minus two percentage points, shall be applied to the Company's average beginning and ending monthly WNA-<u>TRA</u> balances. In no event shall the carrying cost rate be less than 0%. Corresponding interest income and expense amounts shall be recorded on a net cumulative basis for the WNA deferral period.

#### RATE:

CSWNA Table:

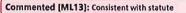
Period	Rate First Effective	Months	Rate Ending Effective	CSWNA (Semiannual)
2021 S1	4/1/2021	12	3/31/2022	<del>\$0.0065</del> 4
2020 S2	10/1/2020	12	9/30/2021	\$0.00325

SRR Table:

Period	Rate First Effective	Months	Rate Ending Effective	CSWNA (Semiannual)
2021 S1	4/1/2021	12	3/31/2022	\$0.0009
2020 S2	10/1/2020	12	<del>9/30/2021</del>	\$0.00018

#### WNA Rider Rate:

Period	Rate First Effective	Months	Rate Ending Effective	CSWNA (Semiannual)
2021 S1	4/1/2021	6	9/30/2022	\$.01006



#### WEATHER NORMALIZATION ADJUSTMENT RIDER Currently Effective WNAR

Applicable for the billing months of September 20XX through August 20XX

Sum of Weather Revenue Adjustments for June 20XX through May 20XX (ARA)	\$ XXX,XXX.xx
Interest on Weather Revenue Adjustments (IFA)	\$ X,XXX.xx
True-Up Amount for September 20XX through August 20XX (TA)	\$ X,XXX.xx
Interest on True-Up Amount (I <sub>TA</sub> )	\$ XX.xx
Total Recovery Amount (TRA = ARA + I <sub>RA</sub> + TA + I <sub>TA</sub> )	\$ XXX,XXX.xx
Annual Volumetric Billing Determinants	ZZ,ZZZ,ZZZ
Weather Normalization Adjustment Rider Rate (WNAR Rate)	\$0.00000 /Ccf
(TRA ÷ Annual Volumetric Billing Determinants)	

Commented [ML14]: This and the inputs change each year.

Commented [ML15]: Constant until next rate case

**Commented [ML16]:** Changes every year. Limit to 5 decimal places

LMM-D-4

Original

Spire Missouri Inc. d/b/a/ Spire

For: Spire Missouri East

#### WEATHER NORMALIZATION ADJUSTMENT RIDER WNAR

#### APPLICABILITY

The Weather Normalization Adjustment ("WNA") Rider is applicable to each therm of gas delivered under the terms of the residential rate schedule throughout the entire service area of Spire East until such time as it may be discontinued or modified by order of the Commission in a general rate case. The Rider will be applied as a separate line item on a customer's bill.

#### CALCULATION OF ADJUSTMENT

The WNA Factor will be calculated for each billing cycle and billing month as follows:

WNA<sub>i</sub> = 
$$\sum_{j=1}^{18} \left( \left( NDD_{ij} - ADD_{ij} \right) \cdot C_{ij} \right) \cdot \beta$$

Where:

the applicable billing cycle month

- $WNA_i$  = Weather Normalization Adjustment
- j = the billing cycle
- $NDD_{ij}$  = the total normal heating degree days based upon Staff's daily normal weather as determined in the most recent rate case.

 $ADD_{ij}$  = the total actual heating degree days, base 65° at St. Louis Lambert International Airport Weather Station

 $C_{ij}$  = the total number of customer charges charged in billing cycle j and billing month i

- = the coefficient of 0.1493772 for Spire East
  - 1. Monthly  $WNA_i = WNA_i \times Weighted Residential Volumetric Rate ("WRVR")_i$
  - 2. The WRVR applicable to each month shall be derived using the billing determinants and residential volumetric rates from the Company's then most-recent rate case. For the winter billing months (November through April) the WRVR shall be equal to the Residential Winter Charge for Gas Used established at the conclusion of each general rate case. For Case No. GR-2017-0215 the amount is \$0.23330. The WRVR for each of the summer billing months (May through October) shall be determined at the conclusion of each general rate case as the percentage of total residential customers whose usage ends in the first rate block multiplied by the volumetric rate of that block plus the percentage of total residential customers whose usage ends in the second rate block multiplied by the volumetric rate of that block multiplied by the volumetric rate of that block. Currently effective summer WRVR's are reflected in the table below:

May	June	July	August	September	October
\$0.21368	\$0.21106	\$0.21044	\$0.21029	\$0.21054	\$0.21096

DATE OF ISSUE: March 20, 2018

#### DATE EFFECTIVE: April 19, 2018

ISSUED BY: C. Eric Lobser, VP, Regulatory & Governmental Affairs Spire Missouri Inc., St. Louis, MO. 63101

FILED Missouri Public Service Commission GR-2017-0215; YG-2018-0117 LMM-D-5 P.S.C. MO. No. 7

Original

Spire Missouri Inc. d/b/a/ Spire

For: Spire Missouri East

#### WEATHER NORMALIZATION ADJUSTMENT RIDER WNAR

3. The Current Semiannual WNA ("CSWNA") shall be the sum of the billing cycle WNA for each of the six Monthly  $WNA_i$  for the billing months in the applicable six month period divided by the annual volumetric billing determinants set for the residential rate class in the most recent rate case.

4. Semiannual Reconciliation Rate ("SRR"): Two (2) months prior to the end of the twelve (12) months of billing of each CSWNA, the over- or under-billing of the numerator of the CSWNA shall be calculated based on ten (10) months actual sales and two (2) months projected sales. The amount of over- or under-billing shall be adjusted as ordered by the Commission, if applicable. The resulting amount shall be divided by the annual volumetric billing determinates set for the residential rate class in the most recent rate case. Two (2) months prior to the end of the twelve (12) months of billing of each SRR, the over- or under-billing of the SRR shall be calculated based on ten (10) months actual sales and two (2) months projected sales. Any remaining over- or under-billing from the SRR shall be applied to the next SRR. The two (2) months projected sales associated with each CSWNA and SSR shall be trued-up with actuals upon calculation of the next applicable SSR.

5. The Company will make a semiannual rate filing with the Commission 30 days prior to the first effective day referenced in the CSWNA table to adjust the WNA Rider. Each CSWNA and SRR will remain in effect for twelve (12) months. The total WNA Rider rate shall be the sum of all effective CSWNAs and SRRs.

6. There shall be a limit of \$0.05 per therm on upward adjustments for the WNA and no limit on downward adjustment. Any WNA adjustments amounts in excess of \$0.05 per therm will be deferred for recovery from customers in the next WNA adjustment and applicable to part a. below.

a. Each month, carrying costs, at a simple rate of interest equal to the prime bank lending rate (as published in The Wall Street Journal on the first business day of such month), minus two percentage points, shall be applied to the Company's average beginning and ending monthly WNA balances. In no event shall the carrying cost rate be less than 0%. Corresponding interest income and expense amounts shall be recorded on a net cumulative basis for the WNA deferral period.

DATE OF ISSUE: March 20, 2018

DATE EFFECTIVE: April 19, 2018

ISSUED BY: C. Eric Lobser, VP, Regulatory & Governmental Affairs Spire Missouri Inc., St. Louis, MO. 63101

> FILED Missouri Public Service Commission GR-2017-0215; YG-2018-0117 LMM-D-5

P.S.C. MO. No. 7 CANCELLING P.S.C. MO. No. 7 Fifth Revised Fourth Revised

WEATHER NORMALIZATION ADJUSTMENT RIDER

SHEET No. 13.2 SHEET No. 13.2

Spire Missouri Inc. d/b/a/ Spire

For: Spire Missouri East

	<u></u>	WNAR		
RATE: CSWNA Table:				
Period	Rate First Effective	Months	Rate Ending Effective	CSWNA (Semiannual)
2021 S1	4/1/2021	12	3/31/2022	\$0.00654
2020 S2	10/1/2020	12	9/30/2021	\$0.00325
SRR Table:	Rate First		Rate Ending	SRR
Period	Effective	Months	Effective	(Semiannual)
2021 S1	4/1/2021	12	3/31/2022	\$0.00009
2020 S2	10/1/2020	12	9/30/2021	\$0.00018
WNA Rider Rat	-			
Period	Rate First Effective	Months	Rate Ending Effective	Monthly WNA Rider Rate
2021 S1	4/1/2021	6	9/30/2021	\$0.01006

DATE OF ISSUE: March 2, 2021

DATE EFFECTIVE: April 1, 2021

ISSUED BY: Scott A. Weitzel, Managing Director, Regulatory & Legislative Affairs Spire Missouri Inc., St. Louis, MO. 63101