

under-recovery of the ACA balance. An over-recovery by the Company is shown as a negative ACA balance that must be returned to customers; an under-recovery is shown as a positive ACA balance that must be collected from customers.

3. Based on its review, as discussed in further detail in the accompanying Staff Recommendation Memorandum, Staff has proposed no adjustments to Spire East's September 30, 2018 ACA account balances as shown in the table in "V. Recommendations" section, pages 6-7, of the Staff Recommendation Memorandum.

4. As a result of outstanding, unresolved documentation issues with the prior ACA period, Staff recommends the Commission hold this case open pending resolution of the previous Spire East ACA case (GR-2017-0299) which remains open.

5. Further based on its review Staff tenders certain comments, concerns, and recommendations as explained in the accompanying Staff Recommendation Memorandum. Staff recommends the Commission order Spire East to respond to all comments, concerns, and recommendations in the Staff Recommendation Memorandum within forty-five (45) days.

WHEREFORE, for the reasons stated above and discussed in detail in the accompanying Staff Recommendation Memorandum, Staff recommends the Commission (1) hold this case open pending resolution of the prior Spire East ACA Case No. GR-2017-0299; and (2) issue an order directing Spire East to respond within 45 days to Staff's comments, concerns, and recommendations included in the Staff Recommendation Memorandum.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 17th day of December, 2019.

/s/ Robert S. Berlin