



VIA ELECTRONIC MAIL

December 11, 2020

Secretary Morris Woodruff Missouri Public Service Commission 200 Madison Street Jefferson City, Missouri 65101

RE: Case No. GR-2021-0108

Dear Secretary Woodruff,

On behalf of Spire Missouri Inc. ("Company" or "Spire"), I am transmitting herewith for electronic filing in Case No. GR-2021-0108 tariff sheets which set forth proposed rate schedules and charges, and Exhibit No. 1, which contains (1) a listing and designation of the tariff sheets, and (2) the tariff sheets themselves.

The charges listed in Spire's tariffs sheets are designated to produce a net increase in its base distribution rates of approximately \$65 million. In addition to this net increase, the Company is also requesting rebasing of approximately \$47 million of Infrastructure System Replacement Surcharge ("ISRS"), which is already being recovered in rates.

The proposed rate increase is necessary to recover non-ISRS investments made by Spire to better serve our customers, as well as to reflect increases in certain costs, since our last general rate case which was filed in 2017 and concluded in 2018. Through the course of this case, we look forward to demonstrating the incredible value of natural gas as an energy source. We will also illustrate how these investments further our commitment to our customers, Missouri communities, and the environment.

The proposed revenue increase, expressed as a percentage of total revenues (including gas revenues), varies by rate schedule. The effect of the proposed rates on the Company's residential customers would be to raise the bill of a typical heating customer by an average of approximately \$3.28 per month. Even with this increase, we're proud that average customer bills will remain lower than they were fifteen years ago.

Within the rate schedules, the allocated increase is recovered through increased usage and demand charges where applicable, as well as increases in the customer charges applicable to Spire's various rate classes. There are, of course, numerous rate designs that may be used to recover revenues and implement rate increases. Additional information regarding the proposed general rate increase and

other proposed changes are contained in Exhibit No. 2, which contains the Minimum Filing Requirements specified by 20 CSR 4240-3.030(3)(B) of the Commission's Rules ("Rules").

Spire is also filing its direct testimony today, in accordance with 20 CSR 4240-2.065(1) of the Rules. Testimony will be provided by the following witnesses: Scott Carter, Scott Weitzel, Wesley Selinger, Michelle Antrainer, Trisha Lavin, Timothy Krick, Charles Kuper, Alicia Mueller, Shaylyn Dean, Dylan D'Ascendis, Tim Lyons, and Alan Felsenthal. Spire is also submitting a depreciation study in this proceeding.

The Company understands, as should all other interested parties, that the Commission's review of these filing will involve significant discussions, which could result in a substantial change in the way in which the Company recovers its costs. Spire welcomes and looks forward to those discussions.

The tariff sheets filed herewith contain an issue date of December 11, 2020, with a proposed effective date of January 10, 2021. A copy of the entire filing will be provided to the Commission Staff and to the Office of the Public Counsel, in accordance with the Rules.

A copy of all correspondence, notices, orders and other communications in connection with this matter should be furnished to Lew Keathley, Spire's Senior Regulatory Analyst, 700 Market Street, St. Louis, MO 63101 (lew.keathley@spireenergy.com), and to the undersigned counsel for Spire. All data requests directed to Spire in this proceeding should also be delivered to datarequests@spireenergy.com.

We look forward to working with Commission Staff and all other intervenors throughout this proceeding.

Sincerely,

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cc:

Commission Staff
Office of the Public Counsel