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

<u>NOTICE OF FILING OF SPIRE'S SECOND</u> SET OF SUBSTITUTE COMPLIANCE TARIFFS

Comes now Spire Missouri Inc. d/b/a Spire ("Spire" or "Company") and in compliance with the Commission's Order issued on November 22, 2021, files this Notice of Filing of Spire's Second Set of Substitute Compliance Tariffs and hereby states the following in support of this Response:

- On November 10, 2021, Spire filed Compliance tariffs to reflect the Commission's October 27, 2021 Report and Order.
- On November 12, 2021, the Commission issued an Amended Report and Order in this case.
- On November 17, 2021, Spire filed substitute tariff sheets to reflect some changes made by Spire to its compliance tariffs as a result of recent Commission Orders and conversations with Staff.
- 4. On November 19, 2021, Staff filed a *Motion for Extension* requesting more time to file its recommendation, up to and including until November 30, 2021.
- 5. Also, on November 19, 2021, Midwest Energy Consumers Group ("MECG") and Vicinity Energy Kansas City, Inc. ("Vicinity") filed a joint response to the Commission's November 12 Order citing concerns related to the Large Volume Transportation Service tariff language ("transportation tariff") included in Spire's

compliance tariffs. The Office of Public Counsel ("OPC") also filed a response noting inconsistencies with the Amended Report and Order and the Weather Normalization Adjustment Rider ("WNAR") tariff sheets.

- 6. On November 22, 2021, the Commission issued an *Order Granting Extension, Shortening Time for Responses and Directing the Parties Meet and Confer.* The Order required Spire to, among other items file an accompanying pleading with its substitute compliance tariffs explaining how the objections raised by OPC, MECG and Vicinity have been addressed.
- 7. Spire's second substitute compliance tariffs are being filed concurrently with this pleading and therefore this filing is made in compliance with the November 22 Order.
- 8. Spire has worked with OPC to address the OPC's concerns related to the Company's WNAR tariff. Spire has since updated the WNAR tariff consistent with the Amended Report and Order. OPC has confirmed that it satisfied with the changes made to the Company's WNAR tariff.
- 9. Spire has also revised the Large Volume (LV) transportation tariff language raised by MECG and Vicinity so that it now complies with the Commission approved Stipulation and Agreement. Spire has also discussed the inclusion of the PGA language in the LV transportation tariffs with counsel for MECG. MECG and Vicinity are still reviewing the language for the LV transportation tariffs and discussion between MECG and Vicinity are still ongoing.
- 10. Spire will continue communication with Staff, OPC and other parties on the appropriate wording for the compliance tariffs to ensure they accurately reflect the Commission's Amended Report and Order. Those conversations will continue as Staff continues its

review in preparation for its Recommendation on these compliance tariffs. If necessary,

the Company will file substitute compliance tariffs in light of additional discussions

and review amongst the Parties.

Wherefore Spire requests the Commission accept this Notice and find that it is compliant with

the Commission's November 22 Order.

/s/ Goldie Bockstruck

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served electronically, or handdelivered, or via First Class United States Mail, postage prepaid, on all parties of record herein on this 23rd day of November, 2021.

/s/ Lew Keathley