

## MEMORANDUM

To: Case No. GO-2026-0001

From: Lena M. Mantle  
Senior Analyst, Office of the Public Counsel

Re: 2025 WNAR Rate Cap

Date: August 14, 2025

It is Spire and Staff's assertion that the "cap" described in the Weather Normalization Adjustment Rider ("WNAR") refers to a cap on the change from the previous year's WNAR rate. If they are correct, that would mean that the cap on the WNAR rate for 2025 is \$0.12577/Ccf.

The WNAR rate Spire seeks in this file is \$0.05128/Ccf. The workpapers provided by Spire show the year was warmer than normal by 499 heating degree days ("HDD").<sup>1</sup>

I used this information to extrapolate the HDD difference necessary to result in a rate of \$0.12577/Ccf. My analysis showed that such a rate requires 1,479 HDD<sup>2</sup> – almost three times the HDD difference that actually occurred. In other words, to reach the cap this year, the actual HDD would have to be 2,902 with the current normal of 4,381 HDD. According to NOAA's online weather data, the winter of 2011 – 2012 was the warmest winter in the past 25 years with 3,300 HDD. So, to reach the cap as Staff and Spire define it, the winter of 2024 through 2025 would have to have been warmer than all the winters this century and very unlikely to happen before the Spire's next rate case in which the normal HDD will be reset.

This calculation is shown below.

A	Annual Revenue Adjustment ("ARA") Rate	\$0.03794/Ccf	
B	True up Rate	\$0.01334/Ccf	
C	WNAR Rate	\$0.05128/Ccf	A + B
D	Difference from normal	499 HDD	
E	ARA Rate per HDD	0.0000760391	A ÷ D
F	2024 Rate	\$0.07577/Ccf	
G	Cap on 2025 Rate	\$0.12577/Ccf	F + 0.05
H	Diff from Normal HDD to reach cap	1,479 HDD	(G -B) ÷ E

<sup>1</sup> HDD equals zero if the average of the high and low temperature for the day was greater than 65. HDD equals 65 minus the average of the high and low temperature for the day if the average temperature was lower than 65.

<sup>2</sup> I accounted for the true up amounts for the 2024 WNAR in calculating this amount.

In addition, it is worth noting that by agreeing to the definition of cap proposed by Spire and Staff, the Commission is agreeing to allow up to a 34% increase. Spire East's residential volumetric charge for gas service in the winter months is currently \$0.36538/Ccf. A WNAR rate of \$0.12577/Ccf would increase the non-PGA volumetric charge by 34%. A \$0.05/Ccf cap would limit this increase to 14%.


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

**AFFIDAVIT OF LENA M. MANTLE**

STATE OF MISSOURI     )  
                                  )     SS.  
COUNTY OF COLE     )

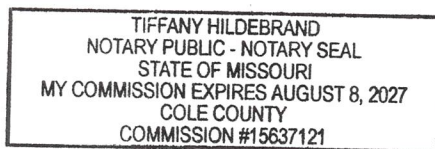
**COMES NOW LENA M. MANTLE** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Memorandum* and that the same is true and correct according to her best knowledge and belief.


Further the Affiant sayeth not.

  
Lena M. Mantle  
Senior Analyst

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 14<sup>th</sup> day of August, 2025.



  
Tiffany Hildebrand  
Notary Public

My Commission expires August 8, 2027.