

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

In the Matter of Spire Missouri Inc. d/b/a Spire's	)	
Application to Update its Weather Normalization	)	<b>Case No. GO-2026-0001</b>
Adjustment Rider (WNAR) for Spire East and Spire	)	
West	)	

**MOTION FOR LEAVE TO FILE AND SURREPLY TO OPC**

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company") and, in response to the Office of Public Counsel's reply to Spire Missouri's response, moves for leave to file this surreply and submits its surreply to the Missouri Public Service Commission ("Commission"), stating the following:

**Motion for Leave to File**

1. On August 4, 2025, the Office of Public Counsel ("OPC") filed its response to the Company's application to update its Weather Normalization Adjustment ("WNAR") for Spire East and Spire West, objecting to the Spire East rate requested by the Company.
2. On August 8, 2025, Staff of the Commission filed its response to the OPC's objection.
3. On August 11, 2025, Spire Missouri filed its response to the OPC's objection.
4. On August 14, 2025, the OPC filed its reply to Spire Missouri's response. In its reply, the OPC addresses the arguments of both Staff and Spire Missouri. In responding to Staff directly, the OPC presented a new point not previously raised in its August 4, 2025 filing, specifically referring to the WNAR as an adjustment to the Company's base rate, stating "the purpose of the WNAR is to operate as an overall adjustment to the Company's base rates...in other words, the entire WNAR rate is an adjustment. Because the entire WNAR is an adjustment to the

Company's base rates, a 'limit on adjustments under the WNAR tariff' can be interpreted to mean a limit on the entire WNAR rate imposed by the WNAR tariff, as the OPC argues."

5. The purpose of the WNAR is not to be an adjustment to the Company's base rates, and the Company moves for leave to file this surreply primarily to address this inaccuracy.

### **Surreply**

6. The notion that the purpose of the WNAR is to be an adjustment to the Company's base rates is quickly disposed by the fact that WNAR stands for Weather Normalization Adjustment *Rider*. The WNAR rate is not an adjustment to base rates, but an additional line item on the bill to recover or return under or over collected revenue. Under the Missouri regulatory structure, base rates are set in a general rate proceeding and remain the same until rates are changed in the next general proceeding. There are additional bill riders, approved by the Commission, that allow utilities to recover certain costs, but those riders are not adjusting base rates regardless of whether they are a surcharge or charged on a per Ccf basis.

7. This distinction contradicts the OPC's argument that the Commission, in its order in Case No. GR-2017-0215 (the "Order"), intended for a "limit of \$0.05 per therm (or Ccf) on upward adjustments" to refer to a cap on the total WNAR rate allowed. The WNAR is not an adjustment to base rates, but its own rider. Therefore, like the Company's other riders, such as the Infrastructure System Replacement Surcharge or the Purchased Gas Adjustment, the WNAR may be adjusted in separate filings outside of general rate proceedings. Examining the WNAR as its own standalone rider allows for the correct interpretation of the Commission's order that the limit was intended to be imposed on adjustments to this rider, not the Company's base rates. Therefore, the \$0.05 limit would be from the currently effective rider.

8. Adding further clarity to this is the Company's WNAR tariffs that are currently effective. Sheet No. 13.8 states: "There shall be a limit of \$0.05 per Ccf on upward adjustments for the WNAR rate and no limit on downward adjustment." This language, approved by the Commission, clearly states that the limit is on adjustments to the rider itself, not the Company's base rates. Moreover, if the Commission had even intended to just cap the rider at \$0.05 per Ccf, the Commission could have had Spire Missouri use similar language in place for the Company's PGA Filing Adjustment Factor ("FAF") in the Company's PGA tariffs. On Sheet No. 11.1, the FAF is not allowed to "exceed five cents (\$0.05) per Ccf. If the Commission intended on making the WNAR capped at \$0.05 per Ccf, similar language could have been used. Instead, in its Order and in the tariff, the Commission used and approved "**limit...on upward adjustments,**" signifying its intent to limit adjustments to the WNAR, not cap it at a specific rate. The order and the tariff simply do not state what the OPC is suggesting.

9. The Company also notes two additional issues with the OPC's reply. First, the OPC states that the purpose of the WNAR is "to account for variations in usage caused by weather and *conservation*." While Spire Missouri believes that the WNAR mechanism should account for conservation as well, it currently does not. Second, in its attached memorandum, the OPC uses annual data to examine heating degree days for the purposes of WNAR, however, the WNAR is not calculated with annual data, but billing cycle data. This may affect the comparison that OPC is attempting to make. Regardless, the issue before the Commission is not with the calculation of the WNAR, but the Commission's interpretation of the Order and tariff language setting a "limit...on upward adjustments."

**WHEREFORE**, Spire Missouri respectfully requests that the Commission grant the motion for leave to file this surreply, deny OPC's request, and order the proposed WNAR Tariff

Sheet to become effective on September 1, 2025, and grant any other relief as is just and reasonable.

Respectfully submitted,

*/s/ J. Antonio Arias*

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**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of this filing was served to all counsel of record on this 18<sup>th</sup> day of August 2025 by electronic mail.

*/s/ J. Antonio Arias*

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