

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

In the Matter of Spire Missouri, Inc., d/b/a)	
Spire's Revised PGA Rates for Spire)	<u>Case No. GR-2024-0341</u>
Missouri West)	

**STAFF RECOMMENDATION REGARDING SPIRE MISSOURI INC., D/B/A SPIRE'S
2023-2024 ACTUAL COST ADJUSTMENT FILING**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") in the above-captioned matter and files its Actual Cost Adjustment ("ACA") Recommendation in this case concerning Spire Missouri, Inc., d/b/a Spire's ("Spire") 2023-2024 ACA filing as set forth in the accompanying Staff Recommendation Memorandum (Appendix A), and further states as follows:

1. Spire filed its ACA for the 2023-2024 period in this case on October 31, 2024, and November 1, 2024 (substitute tariff sheet). This filing revised the ACA rates based upon Spire's calculations of its ACA account balances for the 2023-2024 period.

2. The Commission's Procurement Analysis Department Staff ("Staff") has reviewed Spire's filing and submits its recommendation as further explained in the accompanying Staff Recommendation Memorandum, marked as Appendix A and incorporated by reference herein. Staff's analysis consisted of a review of Spire's natural gas supply plans including a review of Spire's gas purchasing practices to evaluate the prudence of the purchasing decisions for this ACA period; a reliability analysis; and a hedging review. Staff's analysis also included a review of Spire's billed revenues compared with its actual gas costs to determine whether there exists an over-recovery or under-recovery of the ACA balance. An over-recovery 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 (in “Public” and “Confidential” formats), Staff recommends the Commission issue an order requiring Spire to establish the ACA account balances to reflect the under-recovery and over-recovery balances as of September 30, 2024, as shown in the table in the “Recommendations” section of the Staff Recommendation Memorandum.

4. Based on its review Staff has certain comments, concerns and recommendations as set forth in the Billed Revenue, Actual Gas Cost, Reliability Analysis and Gas Supply Planning, Hedging sections, and summarized in the “Recommendations” section of the accompanying Staff Recommendation Memorandum. Staff recommends the Commission order Spire to respond to these concerns, comments, and recommendations within thirty (30) days.

WHEREFORE, for the reasons stated above and discussed in detail in the accompanying Staff Recommendation Memorandum, Staff recommends the Commission issue an order directing Spire to respond within thirty (30) days to Staff’s concerns, comments, and recommendations set forth in the “Recommendations” section.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 15th day of December, 2025.

/s/ J. Scott Stacey