

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

In the Matter of the Application of Spire)	
Missouri, Inc. d/b/a Spire Purchased)	Case No. GR-2024-0341
Gas Adjustment (PGA) Tariff Filing)	

**SPIRE MISSOURI INC.’S RESPONSE TO
STAFF’S RECOMMENDATION**

COMES NOW Spire Missouri, Inc. (“Spire Missouri” or the “Company”), by and through counsel, and respectfully submits its Response to Staff’s Recommendation Regarding Spire’s 2023-2024 Actual Cost Adjustment Filing (“Response”) for its eastern and western operating units, stating the following:

1. On October 31, 2024, and November 1, 2024, Spire Missouri filed revised tariff sheets with the Missouri Public Service Commission (“Commission”) for the Spire East and Spire West Purchased Gas Adjustment (“PGA”), for the 2023-2024 period, which reflected changes to its Actual Cost Adjustment (“ACA”).

2. On November 6, 2024, Staff of the Commission (“Staff”) recommended approval of Spire Missouri’s revised tariff sheets on an interim basis and requested a Commission order directing the filing of its recommendation on December 15, 2025.

3. On December 15, 2025, Staff issued its Recommendation and Memorandum. In its Memorandum, Staff makes six recommendations. Recommendations 2 through 5 relate to Spire Missouri’s reserve margins and its hedging strategy and program. Recommendation 6 is for the Commission to direct Spire Missouri to respond to Staff’s recommendations within 30 days. The Company is in agreement with these recommendations.

4. Recommendation 1 provides Staff's recommended September 30, 2024 Ending ACA balances for Spire East and Spire West. Staff's recommended balances are shown in the table below.

September 30, 2024 Ending ACA Balances			
Spire East	Company Filing	Staff Adjustments	Staff Recommended
Firm Sales	\$ 29,687,699.55	\$ (565,380.30)	\$ 29,122,319.25
LP Sales	\$ 2,282.73	\$ -	\$ 2,282.73
Spire West			
Firm Sales	\$ (8,864,873.82)	\$ (100,168.82)	\$ (8,965,042.64)

In reaching its recommended balances, Staff made four adjustments to the Company's balances for Spire East and two adjustments to the Company's balances for Spire West. Those adjustments are shown in the following table.

Spire East - Firm Sales	
Issue	Amount
Prior ACA Period Stipulated Adjustment (2022/2023)	\$ (51,644.84)
Delayed Transfer	\$ (198,747.87)
Line of Credit Fees	\$ (195,818.71)
Cash Outs	\$ (119,168.88)
Total Staff Proposed Adjustments	\$ (565,380.30)

Spire West - Firm Sales	
Issue	Amount
Delayed Transfer	\$ (219,337.70)
Cash Outs	\$ 119,168.88
Total Staff Proposed Adjustments	\$ (100,168.82)

For Spire East, Staff's (\$51,644.84) adjustment for the prior ACA period is consistent with the Full and Unanimous Stipulation and Agreement ("Stipulation") in Case No. GR-2023-0157. In that case, Staff had initially recommended that all line of credit fees be disallowed due to the

Company's tariff not containing language allowing for the inclusion of any line of credit fees in the Purchased Gas Adjustment ("PGA"). However, the then-effective tariff was incorrect. In a prior rate case order, the Commission had directed line of credit fees related to gas inventory storage be removed from the PGA. The Commission did not direct all line of credit fees be removed. Instead of the tariff being narrowly adjusted to align with the Commission's order, all of the language related to recovery of line of credit fees had been removed. In the Stipulation in Case No. GR-2023-0157, the Parties agreed the tariff was incorrect and should have stated that the Company could recover line of credit fees except those related to gas storage inventory. The tariff language was corrected to address the issue going forward, and the Parties agreed to an adjustment of (\$51,644.84) for the 2022-2023 period to remove the gas storage inventory line of credit fees. This adjustment is correctly reflected in Staff's Memorandum in the present case, GR-2024-0341, which had already been filed before the Stipulation was effective. Staff has also removed the line of credit fees related to gas storage inventory line of credit fees for the 2023-2024 period, which is consistent with the prior Stipulation and the Company's revised tariff. This adjustment is (\$195,168.88). The Company is in agreement with both adjustments.

5. For both Spire East and Spire West, Staff makes adjustments for Delayed Transfers in the amounts of (\$198,747.87) and (\$219,337.70), respectively. In Case No. GR-2025-0107, the Company's most recent rate case, the Commission directed Spire Missouri to report on issues around disconnections and reconnections. The Company had discovered a backlog of active service connections for residential customers without an account. When a customer moves out of their residence and stops their service, the Company does not physically disconnect service immediately. The customer account is closed, and the gas is left on for the next owner of the residence, allowing for a more seamless transition for the new customer. However, customers

would not always call in to create an account and the physical disconnections were not always occurring in a timely manner. Therefore, there were cases where gas service was used without an account for longer than 12 months, which exceeds the period of time that the Company is allowed to back bill when there is an undercharge. As this was the Company's error, Staff's adjustment increases the billed revenue to account for what the Company should have been able to bill, had the backlog not occurred. The Company filed a very comprehensive report in Case No. GR-2025-0107¹ detailing exactly what happened and the actions the Company has taken to ensure it does not happen again. Spire Missouri is committed to providing superior customer service to its customers and values transparent and open communication with the Commission and we appreciated the opportunity to respond to the issues highlighted by the Commission in Case No. GR-2025-0107,² and can sincerely say that these issues should not have occurred. We have corrected the process issues that led to this mistake, more fully documented the process, implemented recommendations, and will proactively communicate similar issues in the future. The Company agrees with Staff's adjustment.

6. Finally, Staff makes an adjustment to Cash Outs related to the School Transportation program. In the School Transportation program, there is an annual reconciliation for cash outs, versus the monthly cash out process for standard transportation customers. During this period, a School Transportation cash out was inadvertently booked to Spire West instead of Spire East. Staff has adjusted where the cash out should be accounted for, and Spire agrees with the adjustment.

¹ Case No. GR-2025-0107, Item No. 76, Supp. Dir. Test. of David Yonce, Sch. DAY-SD-1 Disconnection and Reconnection Report.

² Case No. GR-2025-0107, Item No. 36, Order Directing Spire to Respond to Customer Allegations.

7. As discussed above, the Company is in agreement with all of Staff's recommendations. The Company appreciates Staff's due diligence and collaboration over the past year to ensure that the ending ACA balances for the 2023-2024 period are accurate and correct.

WHEREFORE, Spire Missouri respectfully requests that the Commission accept this response, order the establishment of the September 30, 2024 Ending Balances for Spire East and Spire West as recommended by Staff, and grant any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record this 16th day of January, 2026.

/s/ Julie Johnson