

**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	)	<u>Case No. GO-2027-0003</u>
Normalization Adjustment Rider (WNAR) for	)	Tariff No. JG-2027-0003
Spire East and Spire West.	)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") , by and through counsel, and in response to the Commission's July 2, 2026, *Order Directing Staff Recommendation and Setting Time for Responses* ("Order") submits its *Staff Recommendation* to reject Spire Missouri Inc. d/b/a Spire Missouri's ("Spire Missouri") proposed Weather Normalization Adjustment Rider ("WNAR") tariff sheets and to order further relief, and in support thereof states as follows:

1. On July 1, 2026, Spire Missouri filed proposed revisions to its WNAR tariff sheet assigned Tracking Number JG-2027-0003. The tariff sheets bear an effective date of September 1, 2026.

2. On July 2, 2026, the Commission issued an order directing Staff to file a recommendation regarding the tariff sheets, Tariff File No. JG-2027-0003, no later than July 29, 2026. Also on July 2, 2026, the Commission ordered that any person wishing to respond to Spire Missouri's application or to Staff's recommendation must do so no later than August 10, 2026.

3. As discussed in more detail in the attached Staff memorandum, attached as Appendix A and incorporated herein, Staff has had meetings with Spire Missouri to discuss discrepancies with Spire Missouri's WNAR application, tariff sheets and workpapers with

formulas. During the investigation, Staff determined there were discrepancies with tariff sheet No. 13.3, which is explained more fully in the attached Staff Memorandum, and Staff requested Spire Missouri to submit revised tariff sheets to rectify the discrepancies; however, Spire Missouri would not and instead requested Staff to submit the errors into its Staff Recommendation.

4. Staff has verified that Spire Missouri is not delinquent on any assessment and has filed its Annual Report. Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.

5. As described in Appendix A, Staff has reviewed the tariff sheets, corresponding work papers and weather data, and determined that there were discrepancies. With that, Staff recommends the Commission reject Spire Missouri's Tariff Sheets P.S.C. MO. No. 9 Second revised SHEET No. 13.3 and P.S.C. MO. No. 9 Second revised SHEET No. 13.4, Tariff File No. JG-2027-0003, bearing an effective date of September 1, 2026.

6. Staff further recommends the Commission order Spire Missouri to file corrected Revised Tariff Sheet Nos. 13.3 and 13.4 correcting the errors mentioned within Staff's attached Memorandum for service on and after September 1, 2026.

WHEREFORE, as set forth in Staff's Memorandum, Staff recommends the Commission issue an order rejecting Spire Missouri's WNAR tariff sheets, as substituted July 1, 2026, with an effective date of September 1, 2026:

P.S.C. MO. No. 9

Second Revised Sheet No. 13.3 Cancelling First Revised Sheet No. 13.3

P.S.C. MO. No. 9

Second Revised Sheet No. 13.4 Cancelling First Revised Sheet No. 13.4;

And furthering ordering Spire Missouri to file corrected Revised Tariff Sheet Nos. 13.3 and 13.4 correcting errors mentioned in Staff's Memorandum for service on and after September 1, 2026; and to grant such other and further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

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**Attorney for the Staff of the
Missouri 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 29th day of July, 2026.

/s/ J. Scott Stacey

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
File No. GO-2027-0003 and Tariff Tracking No. JG-2027-0003

FROM: Melissa J. Reynolds, Senior Research/Data Analyst
Water, Sewer, Gas, & Steam Department

/s/ Melissa J. Reynolds 7/29/2026
Water, Sewer, Gas, & Steam Dept. / Date

SUBJECT: Staff Recommendation for the **Rejection** of the revised WNAR Tariff
Sheets Filed by Spire Missouri

DATE: July 29, 2026

On July 1, 2025, Spire Missouri Inc. (“Spire Missouri” or “the Company”) filed with the Missouri Public Service Commission (“Commission”) the following revised tariff sheet to update its Weather Normalization Adjustment Rider (“WNAR”) for Spire East and Spire West, bearing an effective date of September 1, 2026:

P.S.C. MO. No. 9

Second Revised Sheet Nos. 13.3 and 13.4, Canceling First Revised Sheet Nos. 13.3
and 13.4

The Commission directed Staff to file a recommendation regarding the WNAR Tariff Sheet in Tariff Tracking No. JG-2027-0003 no later than July 29, 2026.

STAFF FINDINGS

Staff met with Spire Missouri on July 17, 2026, to review workpapers. Staff requested workpapers with formulas intact and labels identifying origins of data and explained, without which, Staff could not complete its review. Staff reviewed the second revised tariff sheets 13.3 and 13.4 compared to Spire Missouri’s workpapers. Staff discovered numbers in revised tariff sheet No. 13.3 for Residential Spire East did not compute to the requested WNAR rate or match Spire’s workpapers. Staff had a follow up meeting with Spire Missouri on July 23, 2026, to review new workpapers with formulas intact and discuss the Second

Revised Sheet No. 13.3 discrepancies. As discussed during this meeting, numbers were transposed for Spire East residential Interest on the True-up Amount (TA), which should be \$547,724.11 rather than \$547,742.11. Spire Missouri provided the updated Spire East workbook with formulas after the meeting.

Additionally, Staff and Spire Missouri had many discussions comparing Staff's and Spire Missouri's weather files starting July 6, 2026. All in all, Spire Missouri made corrections to its Spire East weather data for April 18, 2026 which impacted the residential Sum of Monthly Weather Revenue Adjustments (ARA), which should be \$17,919,351.11 rather than \$17,940,549.57, the Interest on ARA, which should be \$329,948.82 instead of \$330,016.24, and results in a Spire East residential WNAR rate of \$0.0454/Ccf instead of \$0.04544/Ccf. Changes by Spire East to weather also impacted the second revised tariff sheet no. 13.4 as well. The ARA for Spire East small general customer (SGS) should be \$1,451,732.68 instead of \$1,453,748.87, the Interest on ARA should be \$9,395.97 instead of \$9,402.25, and the Spire East SGS WNAR rate should be \$0.01686/Ccf rather than \$0.01688/Ccf.

Spire Missouri requested that Staff disclose the errors in Staff's recommendation rather than Spire Missouri submitting supplement second revised tariff sheets No. 13.3 and 13.4.

WNAR

The purpose of this tariff is to adjust revenues for differences between actual heating degree days and normal heating degree days. The WNAR is the measurement of the gas usage response of the residential customers to weather. The weather normalization adjustments, in per hundred cubic feet (Ccf), are calculated for each billing cycle and each month based on the usage response and the actual and normal weather measured for each billing cycle. The adjustments are summed across billing months and then divided by the billing determinants in the last rate case resulting in a WNAR rate that is applied for the billing months of September 2026 through August 2027.

The Revised Tariff Sheet, P.S.C. MO. No. 9, Second Revised Sheet No. 13.3 reflects the updated WNAR that would apply to both Spire Missouri East and Spire Missouri West residential rate classes. The Revised Tariff Sheet, P.S.C MO. No. 9, Second Revised Sheet No. 13.4 reflects the updated WNAR that would apply to both Spire Missouri East and Spire Missouri West small general service (SGS) rate class. Both Spire East and Spire West are the operating units of Spire Missouri, Inc. The updated tariff sheets reflect the billing determinants approved by the Commission in its Order issued in Case No. GR-2025-0107 on September 3, 2025.

The proposed residential and SGS rates in both Spire Missouri service areas will be added to customer bills as a separate line item (Table 1). If located in the Spire East rate districts, a residential customer who consumed 100 Ccf of natural gas in a given billing month would receive an estimated \$2.66 decrease in their bill compared to the currently applicable WNAR rate. Similarly, a residential customer in the Spire West rate district consuming 100 Ccf of gas would receive an estimated bill increase of around \$5.00 compared to the current WNAR rate. An SGS customer in Spire East or Spire West who consumed 100 Ccf of natural gas in a given billing month would receive an estimated additional charge of around \$1.69 and \$2.80 respectively.

Table 1. Weather Normalization Adjustment Rate (WNAR)

Spire Service Area	Rate Class	Current WNAR Rate	Proposed WNAR Rate
Spire East	Residential	\$0.05128/Ccf	\$0.04540/Ccf
Spire East	SGS	NONE	\$0.01686/Ccf
Spire West	Residential	\$0.03246/Ccf	\$0.08246/Ccf
Spire West	SGS	NONE	\$0.02795/Ccf

Staff Recommendation

At this time, Staff recommends the Commission enter an order (1) rejecting the Revised Tariff Sheets, P.S.C MO. No. 9, Second Revised Sheet Nos. 13.3 and 13.4 (2) order Spire

Missouri to file corrected Revised Tariff Sheet Nos. 13.3 and 13.4 correcting errors mentioned above for service on and after September 1, 2026.

Staff has verified that Spire Missouri is not delinquent on any assessment and has filed its Annual Report. Staff is not aware of any other matter pending before the Commission that affects or is affected by this tariff filing.

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for Spire East and Spire West	)	

AFFIDAVIT OF MELISSA J. REYNOLDS

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW MELISSA J. REYNOLDS, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation, in Memorandum form*; and that the same is true and correct according to her best knowledge and belief, under penalty of perjury.

Further the Affiant sayeth not.


MELISSA J. REYNOLDS

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 29th day of July 2026.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: July 18, 2027
Commission Number: 15207377

Dianna L. Vaughn
Notary Public