

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

Symmetry Energy Solutions, LLC,	)	
	)	
Complainant,	)	
	)	
v.	)	<b>Case No. GC-2021-0316</b>
	)	
Spire Missouri Inc.,	)	
	)	
Respondent.	)	

**SPIRE MISSOURI INC.’S ADDITIONAL RESPONSES  
TO SYMMETRY’S FIRST SET OF DATA REQUESTS**

Spire Missouri Inc. (“Spire”) hereby provides the following responses to the Symmetry Energy Solutions, LLC (“Symmetry”) First Set of Data Requests.

These responses are provided in addition to the responses previously provided by letter dated April 28, 2021, and the additional materials provided in August 2021.

Spire provided objections to these data requests by letter dated April 5, 2021. The below responses are provided without waiving those objections.

1. Produce all OFOs issued by Spire to any parties, including affiliates of Spire, affecting the Spire MO West System, including OFOs for gas and transportation imbalances at a meter, shipper, agent, or aggregator level; OFOs related to storage levels and storage withdrawal rates; and OFOs related to operational balance agreements.

**Response:** Response provided on April 28, 2021.

2. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire’s evaluation, actions, and decisions regarding the need for the OFO, including all conditions and circumstances giving rise to the need for the OFO.

**Response:** Response provided on April 28, 2021.

3. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire’s evaluation, actions, and

decisions regarding the need for the OFO, including all conditions and circumstances giving rise to the need for the OFO.

**Response:** See the attached “DR 3 KC Weather Forecast.”

4. For each OFO issued by Spire affecting the Spire MO West System, describe in detail any attempts by Spire to identify specific customers causing the conditions or circumstances giving rise to the need for the OFO.

**Response:** None were taken as the circumstances indicated that problems were system-wide, and not due to individual customers.

5. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to any attempts by Spire to identify specific customers causing the conditions or circumstances giving rise to the need for the OFO.

**Response:** As we said in other requests, the OFO was issued to protect the overall supply availability for our customers given the supply challenges caused by Winter Storm Uri.

6. Describe in detail Spire’s evaluation, actions, and decisions regarding the protection of the integrity of the Spire MO West System.

**Response:** Spire’s actions were based upon its concern as to whether sufficient supply would be present to allow it to maintain pressure.

7. Produce all correspondence and other documents regarding Spire’s evaluation, actions, and decisions regarding the protection of the integrity of the Spire MO West System.

**Response:** In response to the Winter Storm Uri event, Spire activated its Incident Support Team (“IST”). Spire will produce relevant, non-privileged documents relating to the IST activities to the extent they are located.

8. Describe in detail any risk of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

**Response:** See the attached “DR 8” documents.

9. Produce all correspondence and other documents regarding any risk of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

**Response:** See response to DR 8.

10. Describe in detail any occurrence of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

**Response:** See response to DR 8.

11. Produce all correspondence and other documents regarding any occurrence of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

**Response:** See response to DR 8.

12. Describe in detail any risk of excess maximum allowable operating pressure on the Spire MO West System.

**Response:** Spire experienced no such risk.

13. Produce all correspondence and other documents regarding any risk of excess maximum allowable operating pressure on the Spire MO West System.

**Response:** As Spire has stated this was a supply issue and not an issue with Spire's distribution system so there was no need to run distribution system pressures higher than normal during this period.

14. Describe in detail any occurrence of excess maximum allowable operating pressure on the Spire MO West System.

**Response:** See the response to DR 13.

15. Produce all correspondence and other documents regarding any occurrence of excess maximum allowable operating pressure on the Spire MO West System.

**Response:** See the response to DR 13.

16. Describe in detail any risk of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

**Response:** See the response to DR 13.

17. Produce all correspondence and other documents regarding any risk of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

**Response:** Please see document "DR 17."

18. Describe in detail any occurrence of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

**Response:** See the response to DR 8. Spire Missouri is also searching for additional documents concerning the pressure profiles during this period.

19. Produce all correspondence and other documents regarding any occurrence of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

**Response:** See the response to DR 18.

20. Describe in detail any risk of any other condition that may have caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

**Response:** See the response to DR 18.

21. Produce all correspondence and other documents regarding any risk of any other condition that may have caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

**Response:** See the response to DR 18.

22. Describe in detail any occurrence of any other condition that caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

**Response:** Response provided on April 28, 2021.

23. Produce all correspondence and other documents regarding any occurrence of any other condition that caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

**Response:** Response provided on April 28, 2021. See also DR 18.

24. Describe in detail any risk of any other failure of the integrity of the Spire MO West System.

**Response:** Response provided on April 28, 2021.

25. Produce all correspondence and other documents regarding any risk of any other failure of the integrity of the Spire MO West System.

**Response:** Please see DR 17 and 18

26. Describe in detail any occurrence of any other failure of the integrity of the Spire MO West System.

**Response:** Spire experienced no such occurrence.

27. Produce all correspondence and other documents regarding any occurrence of any other failure of the integrity of the Spire MO West System.

**Response:** Spire has no documents responsive to this request.

28. For each OFO issued by Spire affecting the Spire MO West System, describe in detail any evaluation or determination by Spire regarding whether exigent circumstances existed that required immediate or expedited issuance of the OFO.

**Response:** Spire did not believe that expedited issuance of the OFO was necessary as there was sufficient time for responses. The forecast for cold weather and extreme weather conditions came early enough ahead of the storm that Spire was able to give sufficient lead time for the OFO.

29. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to any evaluation or determination by Spire regarding whether exigent circumstances existed that required immediate or expedited issuance of the OFO.

**Response:** See the response to DR 28.

30. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding the timing of issuance of the OFO.

**Response:** See response to DR 2.

31. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding the timing of issuance of the OFO.

**Response:** See responses to DRs 2 and 3.

32. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding the duration of the OFO, including all conditions and circumstances that formed the basis of Spire's decision regarding when to terminate the OFO.

**Response:** Spire left the OFO in place until such time as the gas marketers were substantially in balance and the gas markets returned to normal.

33. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding the duration of the OFO, including all conditions and circumstances that formed the basis of Spire's decision regarding when to terminate the OFO.

**Response:** Spire Missouri left the OFO in place for the same duration as Southern Star Pipeline and until market conditions normalized and supply from gas marketers returned to a balanced state. See the attached OFO issued by Southern Star.

34. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding whether to issue a Standard OFO or Emergency OFO.

**Response:** Spire Missouri would have entered into an Emergency OFO if it felt it could not cover all of the customers behind the city gate, including customers of gas marketers.

35. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding whether to issue a Standard OFO or Emergency OFO.

**Response:** Spire has no documents responsive to this request.

36. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding whether to re-issue a Standard OFO as an Emergency OFO.

**Response:** Please see DR 33 and 34.

37. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding whether to re-issue a Standard OFO as an Emergency OFO.

**Response:** Spire has no documents responsive to this request.

38. For each Standard OFO issued by Spire affecting the Spire MO West System that was not re-issued as an Emergency OFO, describe in detail Spire's evaluation and decision that an Emergency OFO was not necessary or appropriate, including all conditions or circumstances that formed the basis of such determination.

**Response:** Please see DR 8 and 34

39. For each Standard OFO issued by Spire affecting the Spire MO West System that was not re-issued as an Emergency OFO, produce all correspondence and other documents related to Spire's evaluation and decision that an Emergency OFO was not necessary or appropriate, including all conditions or circumstances that formed the basis of such determination.

**Response:** Please see DR 38.

40. State whether the Tariff requires Spire's actions with respect to its OFOs to be reasonable, objective, and non-discriminatory.

**Response:** Response provided on April 28, 2021.

41. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding ensuring that its actions with respect to the OFO were reasonable, objective, and non-discriminatory.

**Response:** Response provided on April 28, 2021.

42. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding ensuring that its actions with respect to the OFO were reasonable, objective, and non-discriminatory.

**Response:** Spire confirmed that the OFO was non-discriminatory in that it applied equally to all gas marketers and transportation customers.

43. Produce all correspondence and other documents related to all requests for voluntary actions from any upstream pipeline (including SS) to Spire regarding the Spire MO West System.

**Response:** Please refer to OFO postings by upstream pipelines.

44. Produce all correspondence and other documents related to all OFOs (including OFOs for gas transport, gas deliveries, gas imbalances, storage withdraws, and operational balance agreements), functional equivalent of OFOs, critical notices, notices of any other requirement, or force majeure notices from any upstream pipeline (including SS) to Spire regarding the Spire MO West System.

**Response:** Please see the documents provided in response to CNEG DR 17 (these documents were provided in DR AO-2021-0264 DR 0306).

45. Produce all correspondence and other documents related to any allegation of unauthorized usage from any upstream pipeline (including SS) regarding the Spire MO West System.

**Response:** See FERC Docket No. RP21-618-000.

46. Produce all correspondence and other documents related to penalties and charges assessed by any upstream pipeline (including SS) to Spire regarding the Spire MO West System.

**Response:** All OFO penalties otherwise due to Southern Star were waived by FERC. For additional information, see FERC Docket No. RP21-618-000.

47. Produce all correspondence and other documents regarding Spire's efforts to insure compliance with requirements of upstream pipeline companies (including SS) regarding the Spire MO West System.

**Response:** Spire Missouri remained in constant contact with the upstream pipeline companies and in preparation for the cold weather event, requested receipt point changes under relevant contracts, and started buying natural gas through the Rockies Express Pipeline. See also DR 8.

48. Identify each OFO issued by Spire to Spire transportation customers served by Symmetry.

**Response:** Please see the previously provided documents that the Company provided in DR AO-2021-0264 DR 0306.

49. Produce all correspondence and other documents related to Spire's issuance of any OFO to Spire transportation customers served by Symmetry.

**Response:** Spire's informal procedure is to provide notice to any customer or community that could be impacted by a curtailment. This includes the media, residential customers, commercial and industrial customers, state and local government officials. Also see Spire's presentation from the Commission's February cold weather event workshop on March 23, 2021. Please also see the documents that the Company provided in response to DR 183 in AO-2021-0264, which were produced in response to SNEG 19. There is no known correspondence with Symmetry customers at this time, but the investigation is ongoing.

50. For each OFO issued by Spire to Spire transportation customers served by Symmetry, describe in detail each effort to provide notice of the OFO, including the manner of notice attempted, the date and time of attempt, the person attempting



to provide notice, and the intended recipient (with contact information) of the notice.

**Response:** Spire notified Symmetry and all other marketers of its OFO. See the correspondence provided in response to CNEG DRs. There is no known correspondence with Symmetry customers, but the investigation is ongoing. The Company engaged in general public communications about the impact of the polar vortex and the need to conserve natural gas during this time.

51. For each OFO issued by Spire to Spire transportation customers served by Symmetry, produce all correspondence and other documents related to each effort to provide notice of the OFO, including the manner of notice attempted, the date and time of attempt, the person attempting to provide notice, and the intended recipient (with contact information) of the notice.

**Response:** See the response to DR 49.

52. State whether you contend that any Spire transportation customers served by Symmetry engaged in conduct that failed to comply with any OFO or Spire directive, and if you do, describe in detail the basis for your contention as to each.

**Response:** Yes. Symmetry's customers burned more gas than what Symmetry was able to deliver to Spire's gates for those days.

53. If you contend that any Spire transportation customers served by Symmetry engaged in conduct that failed to comply with any OFO or Spire directives, produce all correspondence and other documents related to your contention.

**Response:** Please see the previously provided "Confidential Actual Cover Costs Spire MOWEST Daily purchases Feb 12 through Feb 19."

54. State whether you contend that any Spire transportation customers served by Symmetry failed to make all reasonable attempts to comply with any OFO or Spire directives, and if you do, describe in detail the basis for your contention as to each, including a statement of any action you contend any Spire transportation customers served by Symmetry should have, but did not, take.

**Response:** Yes. Symmetry's customers burned more gas than what Symmetry was able to deliver to Spire's gates for those days. If Symmetry was not able to make deliveries on behalf of its customers, it should have requested the customers discontinue using gas in order for Symmetry to avoid penalties.

55. If you contend that any Spire transportation customers served by Symmetry failed to make all reasonable attempts to comply with any OFO or Spire directives, produce all correspondence and other documents related to your contention.

**Response:** See Response to DR 53 and DR54.

56. For each OFO issued by Spire affecting the Spire MO West System, describe in detail any attempts by Spire to remedy the conditions or circumstances giving rise to the need for the OFO, including through requests for voluntary actions.

**Response:** Please see the previously provided “Confidential Actual Cover Costs Spire MOWEST Daily purchases Feb 12 through Feb 19” and “GC-2021-0316 DR Response CONFIDENTIAL MOW Invoice.” Please refer to customer communication outreach documents previously provided with the CNEG DR responses.

57. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to any attempts by Spire to remedy the conditions or circumstances giving rise to the need for the OFO, including through requests for voluntary actions.

**Response:** See Response to DR 56.

58. To the extent not produced in response to other Data Requests, produce all correspondence and other documents related to Spire’s issuance of OFOs affecting the Spire MO West System.

**Response:** Please see the attached “DR 58 Symmetry ICE Conversation.”

59. Produce all correspondence and other documents related to Spire’s evaluation of whether to issue any request for voluntary action affecting the Spire MO West System.

**Response:** Please refer to customer communication outreach documents previously provided with the CNEG DR responses, as well as the ICE chat between representatives of Spire Missouri and Symmetry referenced in DR 58.

60. Produce all notices in any form (including those made via an electronic bulletin board, instant messaging service, online chat, messaging app, email, facsimile, text message, video conference, telephone, or commercial radio or television) to any parties, including affiliates of Spire, regarding requests by Spire for voluntary actions, including voluntary actions for the management of or adjustment to gas

nominations for receipts, deliveries, imbalances, and storage levels or withdrawals.

**Response:** See the responses to CNEG data requests previously provided, to include the document related to MoPSC File No. AO-2021-0264.

61. Produce all notices of POCs initiated by Spire to any parties, including affiliates of Spire, affecting the Spire MO West System.

**Response:** Spire has no documents responsive to this request as no POC was initiated by Spire.

62. Produce all correspondence and other documents related to any POC initiated by Spire affecting the Spire MO West System.

**Response:** Spire has no documents responsive to this request as no POC was initiated by Spire.

63. Describe in detail Spire's evaluation, actions, and decisions regarding whether to initiate any POC affecting the Spire MO West System, including all conditions and circumstances considered in the course of such evaluation, actions, and decisions.

**Response:** Spire did not believe it was necessary to initiate any POC because it was able to cover the marketer shortfalls through purchases.

64. Produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding whether to initiate any POC affecting the Spire MO West System.

**Response:** Please see the previously provided "Confidential Actual Cover Costs Spire MOWEST Daily purchases Feb 12 through Feb 19" and "GC-2021-0316 DR Response CONFIDENTIAL MOW Invoice."

65. Produce all correspondence and other documents regarding the delivery or exchange of gas by SS to Spire or by Spire to SS.

**Response:** Spire has no documents responsive to this request.

66. Produce all correspondence and other documents regarding the injection or withdrawal of any gas owned by Spire into or from SS owned or operated storage facilities.

**Response:** See DR 75.

67. Describe in detail any instances of gas imbalances on the Spire MO West System.

**Response:** Please see the previously provided “Confidential Actual Cover Costs Spire MOWEST Daily purchases Feb 12 through Feb 19.”

68. Produce all correspondence and other documents regarding any gas imbalances on the Spire MO West System.

**Response:** Please see the previously provided “Confidential Actual Cover Costs Spire MOWEST Daily purchases Feb 12 through Feb 19,” as well as the previously provided demand letters and invoices.

69. Produce all correspondence and other documents regarding any gas imbalances on the SS System.

**Response:** See response to DR 66 and FERC Docket No. RP21-618-000.

70. State whether the Spire MO West System was completely physically balanced on a cumulative basis by the end and for the month of February 2021.

**Response:** During the time period of the polar vortex, Spire was concerned about maintaining the integrity of our system. At the end of February 2021, the Spire MO West System was physically balanced on a cumulative basis by the end of the month as normal.

71. State whether gas receipts and deliveries for any Spire transportation customers served by Symmetry were physically balanced on a cumulative basis by the end and for the month of February, 2021.

**Response:** Symmetry’s transport customers were balanced with a cash out process at the end of the month and billed accordingly. Imbalances that occurred during the OFO period do not get factored into the normal monthly imbalance calculation they were under the 5% threshold on a daily basis.

72. Produce all correspondence between Spire and Spire Marketing.

**Response:** Spire Missouri communicated with Spire Marketing in the same manner it did with all marketers. Please refer to the confidential correspondence with Spire Marketing regarding its OFO penalties, which have been paid, that was provided in response to CNEG DR 26. This information is confidential and protected by 20 CSR 4240-2.135(2)(A) 1.

73. Provide a detailed list of all gas purchase, sale, exchange, and other transactions made by Spire related to the SS System or the Spire MO West System, including intra-storage transactions and any transactions within any pools on the SS System or Spire MO West System, including for each transaction:
- i. Receipt point;
  - ii. Delivery point;
  - iii. Volume;
  - iv. Identity of seller;
  - v. Identity of buyer;
  - vi. Identity of any Spire employee(s) or agent(s) who participated in the transaction;
  - vii. Exchange conditions;
  - viii. Purchase price;
  - ix. Sale price;
  - x. Any penalties, charges, fees, or other adders that affected either revenue or cost associated with the transaction; and
  - xi. Whether such price, penalties, charges, fees, or other adders have been paid or received by Spire.

**Response:** Please see the previously provided “GC-2021-0316 DR Response CONFIDENTIAL MOW Invoice.”

74. Produce all correspondence and documents related to all gas purchase, sale, exchange, and other transactions made by Spire related to the SS System or the Spire MO West System, including intra-storage transactions and any transactions within any pools on the SS System or Spire MO West System.

**Response:** See the response to DR 73.

75. Produce documents sufficient to show the daily gas volumes owned or managed by Spire in storage on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System.

**Response:** See the attached “DR 75 SSC Storage Feb 21” and “DR 75 PEPL StoBal\_12051527.”

76. Produce documents sufficient to show the daily gas volumes owned or managed by Spire injected into storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System.

**Response:** See Response to DR 75.

77. For each injection of gas into storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System, produce documents sufficient to show the volume of gas, the source from which the gas was obtained, and all sums Spire paid for the gas.

**Response:** See Spire's objection of April 5, 2021.

78. Produce documents sufficient to show the daily gas volumes owned or managed by Spire withdrawn from storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System.

**Response:** See Response to DR 75.

79. For each withdrawal of gas from storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System, produce documents sufficient to show the volume of gas, the customer or other party to whom the gas was provided, and all sums paid to Spire for the gas.

**Response:** See Spire's objection of April 5, 2021.

80. Provide a detailed, daily list of all nomination changes and physical curtailments made by Spire for and on gas transport, receipt, and delivery volumes for any Spire transportation customers served by Symmetry.

**Response:** See Spire's objection of April 5, 2021.

81. Produce all correspondence and other documents related to all nomination changes and physical curtailments made by Spire for and on gas transport, receipt, and delivery volumes on the Spire MO West System.

**Response:** See Spire's objection of April 5, 2021.

82. Produce all notices in any form (including those made via an electronic bulletin board, instant messaging service, online chat, messaging app, email, facsimile,

text message, video conference, telephone, or commercial radio or television) to any parties, including affiliates of Spire, regarding any changes to confirmed gas receipt and delivery nominations.

**Response:** See Spire's objection of April 5, 2021.

83. Produce all notices in any form (including those made via an electronic bulletin board, instant messaging service, online chat, messaging app, email, facsimile, text message, video conference, telephone, or commercial radio or television) to any parties, including affiliates of Spire, regarding daily retainage-adjusted confirmed nominations.

**Response:** See Spire's objection of April 5, 2021.

84. Provide a detailed list of all unauthorized deliveries under any OFO or during a POC affecting the Spire MO West System, including for each such unauthorized delivery the customer, meter, and daily unauthorized volume.

**Response:** Spire Missouri had no unauthorized deliveries during the event. Spire Missouri was willing to take gas from any and all locations. The OFO was related to unauthorized under-deliveries.

85. Produce all correspondence and other documents related to all unauthorized deliveries under an OFO or during a POC on the Spire MO West System.

**Response:** See DR 84

86. Provide a detailed list of all penalties and charges assessed related to any OFO or POC affecting the Spire MO West System, including for each such penalty or charge the customer, any customer agent, any customer marketer, the OFO or POC underlying the penalty or charge, the amount of the penalty or charge, and the basis for the calculation of the penalty or charge.

**Response:** Please see the previously provided "Confidential Actual Cover Costs Spire MOWEST Daily purchases Feb 12 through Feb 19."

87. Produce all correspondence and other documents related to any penalties and charges assessed related to any OFO or POC affecting the Spire MO West System.

**Response:** See response to DR 86.

88. Describe in detail your method of calculation for each penalty or charge assessed against Spire transportation customers served by Symmetry.

**Response:** Response provided on April 28, 2021.

89. Describe in detail your factual basis for each penalty or charge assessed against Spire transportation customers served by Symmetry.

**Response:** Response provided on April 28, 2021.

90. Describe in detail your legal basis for each penalty or charge assessed against Spire transportation customers served by Symmetry.

**Response:** Response provided on April 28, 2021.

91. For each penalty or charge assessed against Spire transportation customers served by Symmetry, describe in detail all costs incurred by Spire in connection with providing the services giving rise to the penalty or charge.

**Response:** See Responses to DRs 88, 89, and 90.

92. Produce all correspondence and other documents related to any penalties and charges assessed to Spire transportation customers served by Symmetry, including all documents related to all prices and volumes on which Spire is basing the calculation of such penalties and charges and all documents related to the costs incurred by Spire in connection with the services giving rise to such penalties and charges.

**Response:** Spire has no documents responsive to this request.

93. Produce proof of all gas purchases and associated costs on a per-unit total for all purchases on which Spire is relying for its assessment of penalties and charges to Spire transportation customers served by Symmetry.

**Response:** Spire has no documents responsive to this request.

94. State whether the Tariff requires that all penalties associated with an OFO be limited as practicable to address only the problem(s) giving rise to the need for the OFO.

**Response:** The tariff speaks for itself.

95. For each penalty or charge assessed against Spire transportation customers served by Symmetry, describe in detail Spire's evaluations, actions, and decisions



regarding limiting the penalty or charge as practicable to address only the problem(s) giving rise to the need for the OFO associated with the penalty or charge.

**Response:** To date, no penalty or charge has been assessed against Spire transportation customers served by Symmetry.

96. For each penalty or charge assessed against Spire transportation customers served by Symmetry, produce all correspondence and other documents related to Spire's evaluations, actions, and decisions regarding limiting the penalty or charge as practicable to address only the problem(s) giving rise to the need for the OFO associated with the penalty or charge.

**Response:** Spire has no documents responsive to this request.

97. For any penalties and charges associated with an OFO affecting the Spire MO West System, describe in detail Spire's evaluations, actions, and decisions regarding limiting the amount and duration of the penalties and charges as practicable to address only the problem(s) giving rise to the need for the OFO.

**Response:** Spire was closely monitoring its system and ended the OFO once marketers were substantially in balance and the gas markets had returned to normal.

98. For any penalties and charges associated with an OFO affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluations, actions, and decisions regarding limiting the amount and duration of the penalties and charges as practicable to address only the problem(s) giving rise to the need for the OFO.

**Response:**

99. State your monthly gross profit for the Spire MO West System for the months of February 2020, November 2020, December 2020, January 2021, and February 2021, taking into account all penalties and charges assessed (even if not yet collected).

**Response:** Spire receives no profit from penalties and charges associated with natural gas sales.

100. State your monthly gross profit attributable to Spire transportation customers served by Symmetry for the months of February 2020, November 2020, December 2020, January 2021, and February 2021, taking into account all penalties and charges assessed (even if not yet collected).

**Response:** Spire receives no profit from the penalties and charges associated with natural gas sales.

101. Please identify and provide supporting documentation for the gas purchases Spire refers to its Motion to Intervene and Comments of Spire Missouri Inc. in the proceeding before the Federal Energy Regulatory Commission, Docket No. RP21-618-000, in which it states “Spire Missouri acquired significant quantities of flowing gas to ensure it could meet the requirements of its customers and incurred a considerable expense to do so during the period of peak demand.”

**Response:** Please see the summary of Spire’s incremental gas purchases during the OFO period (actual cover costs) provided in response to CNEG 14, which is confidential and protected under Commission Rule 20 CSR 4240-2.135(2)(A) 3 and 4.

102. Produce all correspondence with S&P Global Platts, including but not limited to any affiliate and representative, regarding its published pricing during the OFO Period.

**Response:** See the attached documents referencing “DR 102.”

103. To the extent not produced in response to other Data Requests, produce all correspondence and other documents related to the Winter Storm Event.

**Response:** See Spire’s objection of April 5, 2021.



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**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 9<sup>th</sup> day of September, 2021, to:

Katherine Sawyer  
[Katherine.Sawyer@lw.com](mailto:Katherine.Sawyer@lw.com)

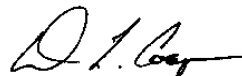
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General Counsel's Office  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)



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Spire Missouri Inc.  
700 Market Street  
St. Louis, MO 63101

VIA ELECTRONIC MAIL

April 28, 2021

Ms. Peggy Whipple  
3010 E. Battlefield, Suite A  
Springfield, MO 65804

RE: Case No. GC-2021-0316. **Spire Missouri Inc's** Response to First Set of Data Requests from Symmetry Energy Solutions, LLC.

Dear Ms. Whipple,

**Spire Missouri Inc. ("Spire")** received Data Requests (DRs) 0001-0103 in the above referenced case on March 26, 2021, from **Symmetry Energy Solutions, LLC ("Symmetry")**. Spire objected to many of those DRs on April 5, 2021, and we have agreed that a response to the data requests which were not included in the objections would be provided to you today, April 28, 2021. For your convenience, the Company has set forth the DR, followed by its response.

#### SYMMETRY DATA REQUESTS

1. Produce all OFOs issued by Spire to any parties, including affiliates of Spire, affecting the Spire MO West System, including OFOs for gas and transportation imbalances at a meter, shipper, agent, or aggregator level; OFOs related to storage levels and storage withdrawal rates; and OFOs related to operational balance agreements.

Response: Please see the attached documents that are responsive to this request.

2. For each OFO issued by Spire affecting the Spire MO West System, describe in detail **Spire's evaluation**, actions, and decisions regarding the need for the OFO, including all conditions and circumstances giving rise to the need for the OFO.

Response: The timing of the weather event being a late season cold, the OFO that Southern Star issued, and the need to uphold the integrity of our MO West system all played a part in making our decision to issue an LDC OFO. Spire started seeing prices beginning to rise prior to February 12, 2021 and available supply dwindling. Our storage position at this time was adequate to meet the needs of the rate-based customers demand. Even though Spire was confident about our storage position, Spire was still concerned with the one-third flowing supply requirements for Southern Star Central ("**SSC**") **storage and finding enough** flowing supply. In addition to this supply discrepancy, **Spire was dependent on the marketers' performance during this period to meet our overall** supply needs to maintain sufficient pressure in the distribution system to serve all

## DR 1.19

customers. We rely on deliveries from marketers to serve transportation customers, who are not part of our supply planning process. Spire believed that the best way to protect and maintain the integrity of its distribution system was to enter into an OFO effective Friday February 12, 2021 until February 20, 2021.

22. Describe in detail any occurrence of any other condition that caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

Response: **Please see the Company's** response to Data Request #2. In Southwest Missouri, SSC struggled to maintain sufficient pressure to deliver gas to all communities. Spire nearly lost several towns along that line segment.

23. Produce all correspondence and other documents regarding any occurrence of any other condition that caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

Response: **Please see the Company's response to Data Request #2.** The Company will supplement its response to this request with any responsive documents encountered, as discovery is just beginning.

24. Describe in detail any risk of any other failure of the integrity of the Spire MO West System.

Response: The biggest risk for Spire was its potential to lose service to customers due to lack of flowing supply to meet its customer demand. See **also the Company's** response to Data Request #22.

40. **State whether the Tariff requires Spire's actions with respect to its OFOs to be reasonable, objective, and non-discriminatory.**

Response: The tariff does not explicitly state such a requirement, but Spire endeavors to follow these principles in all of its actions.

41. For each OFO issued by Spire affecting the Spire MO West System, describe in detail **Spire's** evaluation, actions, and decisions regarding ensuring that its actions with respect to the OFO were reasonable, objective, and non-discriminatory.

Response: Spire followed its tariff curtailment plan and requirements. The OFOs applied to all marketers equally. The penalties were assessed based on the tariff formula, which was applied equally to all defaulting marketers.

88. Describe in detail your method of calculation for each penalty or charge assessed against Spire transportation customers served by Symmetry.

Response: Spire compared confirmed nominations to its gate to the actual usage of Symmetry customers on those days, and applied the 5% threshold factor to come up with **the imbalance. Spire consulted Platt's Gas Daily for the SSC daily index price,** and multiplied that by the imbalance.

89. Describe in detail your factual basis for each penalty or charge assessed against Spire transportation customers served by Symmetry.

Response: **Symmetry's customers burned more gas than what Symmetry was able to deliver to Spire's gates for those days. Symmetry's confirmed deliveries dropped** throughout the OFO period, then went to zero.

90. Describe in detail your legal basis for each penalty or charge assessed against Spire transportation customers served by Symmetry.

Response: **Spire's assessment of penalties and charges assessed is set forth in the transportation tariff.** Spire is also owed payment for cover gas costs as a matter of contract and equity. **See also Spire's** allegations in federal lawsuit #4:21-cv-182.

Sincerely,



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Regulatory Counsel  
314-390-2623  
rachel.niemeier@spireenergy.com

cc: Wes Selinger  
Scott Weitzel  
Lew Keathley

## Aplington, Matt

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**From:** Payne, Theresa  
**Sent:** Friday, February 19, 2021 8:56 AM  
**To:** Hayes, Greg  
**Cc:** Powers, Justin  
**Subject:** SPIRE Missouri OFO

Hello,

Spire Missouri is terminating the Standard Operational Flow Order (OFO) effective at 9:00 AM February 20, 2021.

Spire Missouri greatly appreciates your attention to this matter. If you have any questions regarding this notice, please contact me with any questions.

If customers do not adhere to these requests, or if actual weather or operating conditions require it, Spire Missouri could issue a system wide or shipper specific OFO on short notice. Those conditions would be expected to remain in effect through Monday, February 22, 2021. Spire Missouri will review and provide any changes or updates on the status of its system for the period of this posting. If you have any questions regarding this notice, again please contact me with any questions.

Thank you,  
Theresa on behalf of Justin Powers

**Justin Powers**  
Director, Gas Supply

700 Market Street 3<sup>rd</sup> Floor  
St. Louis, MO 63101  
314.452.4167 Mobile  
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Theresa Payne  
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## Aplington, Matt

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**From:** Payne, Theresa  
**Sent:** Friday, February 19, 2021 11:21 AM  
**To:** Hayes, Greg  
**Cc:** Powers, Justin  
**Subject:** OFO Update

Hi All – Sending this again just in case you missed it.

Thank you, Theresa

Hello,

Spire Missouri is terminating the Standard Operational Flow Order (OFO) effective at 9:00 AM February 20, 2021.

Spire Missouri greatly appreciates your attention to this matter. If you have any questions regarding this notice, please contact me with any questions.

If customers do not adhere to these requests, or if actual weather or operating conditions require it, Spire Missouri could issue a system wide or shipper specific OFO on short notice. Those conditions would be expected to remain in effect through Monday, February 22, 2021. Spire Missouri will review and provide any changes or updates on the status of its system for the period of this posting. If you have any questions regarding this notice, again please contact me with any questions.

Thank you,  
Theresa on behalf of Justin Powers

**Justin Powers**  
Director, Gas Supply

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## Aplington, Matt

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**From:** Payne, Theresa  
**Sent:** Wednesday, February 10, 2021 9:20 AM  
**To:** Hayes, Greg  
**Cc:** Powers, Justin  
**Subject:** RE: Spire Missouri West Extreme Weather Alert

Good morning,

Due to predicted extreme cold weather beginning 09:00 am Friday, February 12, 2021, until further notice, Spire Missouri West is issuing a standard operation flow order (Standard OFO). In order to maintain and protect the integrity of our distribution system, Spire Missouri is requesting that all end users control their usage to avoid any Under-Deliveries. Please see our tariff for the charges with non-compliance with this Standard OFO.

Thank you,  
Theresa

**Justin Powers**  
Director, Gas Supply

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