



**I.**  
**COMMUNICATIONS**

The names, titles, and mailing addresses of the persons upon whom all communications concerning this proceeding should be sent are as follows:

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**II.**  
**SYMMETRY'S INTEREST IN THIS PROCEEDING**  
**AND MOTION TO INTERVENE**

Symmetry respectfully moves to intervene in this proceeding. The exact legal name of Symmetry is Symmetry Energy Solutions, LLC. Symmetry is a limited liability company organized under the laws of Delaware with its principal place of business located at 1111 Louisiana Street, B-241, Houston, Texas 77002. Symmetry is a leading retail natural gas supplier providing over 1 trillion cubic feet of natural gas per year to approximately 100,000 customers in over 30 states.

It is in the public interest to permit Symmetry to intervene because Symmetry has a direct interest in the results of this proceeding. Symmetry is a major natural gas supplier to customers behind the city gate of Spire Missouri, Inc. ("Spire Missouri") as well as to customers directly connected to the Enable Mississippi River Transmission, LLC system ("MRT"), the pipeline from which Symmetry sources its gas supplies in the St. Louis metropolitan area. Symmetry currently serves fifty Spire Missouri end users either directly

or indirectly through third-party suppliers. In addition to Symmetry providing service to customers behind the Spire Missouri city gate, Symmetry also holds or is agent for approximately 55 Firm Transportation Service contracts on the MRT. Most of these contracts involve transportation services to customers in the St. Louis area and/or in close proximity to Spire Missouri's service territory. The customers served by Symmetry are a combination of large and small commercial and industrial end-user customers, including primary and secondary schools, prisons, hospitals, critical infrastructure and industry users. Few of these customers have alternate fuel capabilities. Although Symmetry is not a transportation customer of STL Pipeline, Symmetry directly benefits from the natural gas supply flexibility that Spire STL Pipeline provides to Spire Missouri and to the St. Louis area as discussed below. Accordingly, Symmetry has a direct interest in this proceeding, and no other party to this proceeding can adequately represent Symmetry's interest. Therefore, Symmetry's intervention in this proceeding is in the public interest.

### **III.** **BACKGROUND**

STL Pipeline transports natural gas supplies from producing regions across the U.S. to the greater St. Louis area. On June 22, 2021, the U.S. Court of Appeals for the District of Columbia Circuit issued an opinion<sup>2</sup> vacating the Commission's certificate order<sup>3</sup> that approved construction and operation of STL Pipeline and remanding the case to the Commission. On July 26, 2012, STL Pipeline filed the Application with the Commission requesting authorization to allow the STL Pipeline to remain in service until the Commission issues its order on remand.

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<sup>2</sup> *Env't Defense Fund v. FERC*, Case No. 20-1016, Document No. 1903252 (D.C. Cir. June 22, 2021).

<sup>3</sup> *Spire STL Pipeline LLC*, 164 FERC ¶ 61,085 (2018); *order on reh'g*, 169 FERC ¶ 61,134 (2019) ("Certificate Order").

**IV.**  
**COMMENTS IN SUPPORT**

Symmetry respectfully requests that the Commission approve STL Pipeline's Application to ensure that the pipeline remains in service through the upcoming winter heating season, which is roughly 65 days away.<sup>4</sup> This provides little time for retail providers in the St. Louis area to prepare for the potential loss of gas supplies to the region if STL Pipeline is removed from service. Symmetry is concerned that the loss of gas supplies from STL Pipeline this close to the winter heating season could have negative consequences for the St. Louis area.

During last February's storm, suppliers and customers alike suffered the negative effects of a curtailment of natural gas supplies. Prices surged and many customers lost service for significant periods of time. Approving STL Pipeline's Application would allow for continued access to additional natural gas supplies and, importantly, maintain flexibility in sources of natural gas capacity. Considering the experiences of February 2021, Symmetry believes that now is not the time to restrict sources of natural gas resources to Missouri customers.

The risk posed by the potential loss of the gas supplies transported by STL Pipeline during the upcoming winter is not hypothetical. During Winter Storm Uri, Symmetry faced curtailment of gas supplies due to loss of supplies on MRT resulting from force majeure issued by Symmetry's suppliers as well as the loss of supplies due to insufficient pressure on pipelines upstream of MRT's East Line. Of particular note, on February 19, 2021, at approximately 6:30 p.m. CST or only 30 minutes before the Intraday 3 nomination deadline of 7:00 p.m. CST, Symmetry received final confirmation of the loss of 25,000 MMBtu of

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<sup>4</sup> See Application at 17.

supply being sourced on that day from one of the pipelines supplying gas into MRT's East Line. Furthermore, as agent for an industrial customer on MRT, Symmetry knows that this industrial customer also faced curtailment issues on the MRT System. However, Symmetry was able to work around these curtailment issues and source gas for its customers that day, including gas for the industrial customer. Symmetry understands that this gas supply provided to both Symmetry and the industrial customer during the weather event was available only because of the availability of STL Pipeline.<sup>5</sup>

Without the gas supplies transported by STL Pipeline or time to make alternative arrangements, a repeat of last year's winter storm could cause substantial harm to Symmetry's customers and other gas consumers in the St. Louis area. Symmetry therefore requests that the Commission grant STL Pipeline's Application to allow the pipeline to continue to provide service during the upcoming winter season.

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<sup>5</sup> See Application at 3, 10, 25.

**CONCLUSION**

WHEREFORE, for the reasons discussed above, Symmetry respectfully requests that the Commission: (1) allow Symmetry to intervene in this proceeding and to be made a party for all purposes; and (2) grant STL Pipeline’s request for Temporary Emergency Certificate, or in the Alternative a Limited-Term Certificate, to continue operating STL Pipeline.

Respectfully submitted,

*/s/ Stacy Williams*

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Dated: August 23, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding pursuant to 18 C.F.R. § 385.2010(f)(2).

Dated at Washington, D.C., this 23rd day of August, 2021.

*/s/ Rob Matsick*

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