

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

Constellation NewEnergy- Gas Division, LLC,	)	
	)	
Complainant,	)	
	)	
v.	)	File No. GC-2021-0315
	)	
Spire Missouri Inc.,	)	
	)	
Respondent.	)	

**SPIRE MISSOURI INC.’S RESPONSE TO  
CONSTELLATION’S MOTION TO COMPEL DISCOVERY FROM SPIRE**

**COMES NOW** Spire Missouri Inc. (“Spire Missouri” or “Company”), as its *Response to Constellation’s Motion to Compel Discovery From Spire*, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

**RESPONSE**

On February 8, 2022, Constellation NewEnergy-Gas Division, LLC (“CNEG” or “Constellation”) filed its *Motion to Compel Discovery From Spire* (“Motion to Compel” or “Motion”). The Commission issued an Order on February 9, 2022, directing that any responses to the Motion to Compel be filed by February 11, 2022.

**Perspective**

The Commission should remember that at its essence this case exists because CNEG did not provide natural gas to the Spire Missouri Mo West system equal to the amount of natural gas burned by its customers during Winter Storm Uri. The basic function of a marketer is to supply the natural gas used by its customers. Those customers are “transportation” customers of Spire Missouri. Spire Missouri’s primary responsibility is to transport the gas delivered by the marketer to the marketer’s

customer. CNEG did not deliver natural gas equal to that used by its customers during Winter Storm Uri between February 12 and 19, 2021.

This perspective is important as the Commission judges whether requests are proportional to the needs of the case. It is ridiculous to suggest that this case somehow hinges on there being written correspondence related to the issuance of Spire Missouri's Winter Storm Uri operational flow order ("OFO"). This was the time of a truly extraordinary weather event and a period of time when Southern Star Central ("Southern Star") pipeline had issued an OFO to which Spire Missouri was subject. It is hard to imagine a reason that an OFO would not have been appropriate during this time frame.

### **Spire Missouri Gas Supply Practices**

CNEG alleges that it needs "direct evidence of what Spire was saying and doing in February 2021 to (1) buy natural gas, (2) leave natural gas in storage, (3) seek opportunities to engage in transactions with its affiliate (Spire Marketing) rather than independent third parties, and (4) negotiate a profitable sale of natural gas to a third party from Spire's storage position rather than bringing that gas to Spire's system to address alleged operational needs." (Motion, p. 3).

Spire Missouri disagrees that its gas supply practices, especially those for its sale customers, are critical to this complaint. In the Commission's *Order Denying Motion to Dismiss* (May 26, 2021), the Commission stated that the following are the issues in this case:

Whether Spire violated its tariff regarding –

1. the justification for issuance of operational flow orders,
2. the notice provided to shippers about those operational flow orders,
3. the duration of the operational flow orders, and
4. calculation of the penalties it seeks to impose.

As to item 4, Spire Missouri's Penalties for Unauthorized Usage provision 5.(c)(i), found on

Sheet No. 16.14, states:

Standard OFO Penalties: For each day of the Standard OFO, the greater of \$5 or 2 ½ times the daily midpoint stated on Gas Daily’s Index for Southern Star Central Gas pipeline (Oklahoma) times the MMBtu of Unauthorized Over- or Under-deliveries that exceed the tolerance level applicable under Section B-5-a Tolerance Levels.

(emphasis added)

The penalty called for by the tariff is calculated based on “the greater of \$5 or 2 ½ times the daily midpoint stated on Gas Daily’s Index for Southern Star Central Gas pipeline (Oklahoma) . . . .”

There is no separate element or billing for Spire Missouri’s cost of gas. The cost of gas is considered to be included in the “penalty.” Thus, the penalty provision has nothing to do with the details of Spire Missouri’s purchases or sales.

The penalty does concern whether CNEG was supplying gas equal to that being used by its customers (“the MMBtu of Unauthorized Over- or Under-deliveries that exceed the tolerance level applicable under Section B-5-a Tolerance Levels”). During the period of Winter Storm Uri, it was not.

Having said this, Spire Missouri has endeavored to provide information related to its gas purchases, sales and invoices and will continue to do so.

### **Sale to Atmos**

In a related matter, CNEG references the “sale of natural gas to a third party from Spire’s storage position.” (Motion, p. 3, 4, 8). This, presumably, concerns a Spire Missouri sale of storage gas to Atmos during Winter Storm Uri.

That transaction was described in the deposition of Spire Missouri’s George Godat (Corporate Representative) (**Appendix A**, Tr. 75-81, 245-246, 275-278). It also was addressed in Spire Missouri’s responses to the Fifth Set of Data Requests from CNEG. Spire Missouri was

unable to use the gas because of Southern Star restrictions on the use of storage gas. Spire Missouri sold storage gas at a market rate to Atmos, who was in desperate need of gas for its customers. Proceeds from the sale, in accordance with the off-system sales provisions of Spire Missouri's tariff, have been used to reduce the ACA for sales customers. In other words, sales customers would pay more, but for Spire Missouri's sale to Atmos. Of course, as indicated above, none of that relates to the calculation of penalties under the tariff provision or the OFO and, as also indicated, Spire Missouri has provided this information to the parties.

### **ICE Chats, Teams Chats and Electronic Mail**

Specifically, CNEG states that it is seeking documents in four categories:

- (1) chats using the Intercontinental Exchange, Inc. trading platform ("ICE Chats") during February 2021 that are responsive to Constellation's requests;
- (2) Microsoft Teams chats during February 2021 that are responsive to Constellation's requests;
- (3) emails or other communications (*e.g.* chats and text messages) with Southern Star personnel during February 2021; and
- (4) internal Spire emails during February 2021 related to the Spire's Operational Flow Order ("OFO"), Southern Star, operating conditions, Spire's natural gas trading and marketing affiliate (Spire Marketing), and Spire's sales of natural gas from storage before and during Winter Storm Uri (*i.e.* selling gas so other companies could use it on other pipeline systems because Spire determined that it had no need for its storage gas to serve Spire's system operations or its sales or transportation customers).

(Motion, p. 2).

First, it is important to note that Spire Missouri has responded to these requests in the past. In addition to many earlier responses, as was indicated to the regulatory law judge on Tuesday, prior to the filing of this Motion, Spire Missouri was in the process of completing its response to an inquiry by Symmetry Energy Solutions, LLC's ("Symmetry") provided on February 2, 2022, which included

ICE Chats, e-mails with Southern Star and other matters. That response was provided to Symmetry and the other complainants, including CNEG, and other parties on Wednesday.

CNEG alleges that the reason for additional production is that Spire Missouri has released some documents and “withheld” others, or that Spire Missouri is “selectively producing a limited number of responsive documents” (Motion, p. 2, 4, 7). Nothing could be further from the truth. Spire Missouri has produced documents as they have been discovered. As noted by CNEG, Spire Missouri produced a screen shot of one ICE Chat early in this process. (Motion, p. 3). It was previously explained that the Spire Missouri employee involved in that exchange had taken a screen shot in real time of the subject chat because he believed in the absence of such, he would be unable to retrieve the chat. Typically, Spire Missouri uses ICE for trading purposes as it is an industry-wide system. After discussions with the Complainants about discovery and further investigation into the ICE system and its abilities, Spire Missouri has produced additional ICE chats.

Given this situation and additional information provided on Tuesday in the conference with the regulatory law judge, Spire Missouri will be investigating other possible search methods this upcoming week. This will include both the ICE Chat function and the Microsoft Teams Chat function mentioned in the Motion. If any additional information is obtained, Spire Missouri will provide that to the parties.

The request for documents should also not be confused for something it is not. CNEG suggests it “defies belief” that “key Spire employees” “had no communications related to an OFO on either Spire’s system, or on Southern Star’s system.” (Motion, p. 8). Spire Missouri alleges nothing of the sort. Mr. Godat made the decision to issue the OFO. (**Appendix B**, Tr. 44-47). Further, his deposition, in fact, describes “conversations” related to these matters. (**Appendix C**; Tr. 252-256).

However, the question here regards the production of various forms of written correspondence. While all written communications may be “communication,” not all “communications” are in the form of written correspondence.

Moreover, CENG alleges that “Spire has refused to clarify in writing what it did to preserve data, when it took action, or to describe efforts to obtain data such as Teams chats that is not otherwise preserved for an extended period.” (Motion, p. 4). This allegation ignores Spire Missouri’s responses to Symmetry’s Third Set of Data Requests, to which CNEG has access, where Spire Missouri explained what steps it had taken, its position on whether any documents had been destroyed, and, again, provided its document retention policy (it had previously been provided with Mr. Godat’s deposition). (**Appendix D**). Spire Missouri has followed its retention policy.

### **CONCLUSION**

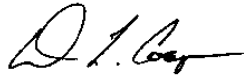
Of course, regardless of what information is found, as stated above, there is no mystery as to Spire Missouri’s actions in this case. The primary pipeline that provides gas supply to the MoWest System, Southern Star, issued an OFO to which Spire Missouri was subject and Spire Missouri was concerned about problems with gas supply (which turned out to be more than warranted). The OFO Spire Missouri issued was an extraordinary measure (Spire Missouri had not issued an OFO since 2014) to address an extraordinary situation (Winter Storm Uri).

The Motion to Compel asks that the Commission compel Spire Missouri “to produce all documents and data responsive to the requests outlined herein or for any such documents and data that once existed, but has not been produced or allegedly cannot now be produced, explain the circumstances of such data loss that resulted in Spire’s inability to produce such documents.” (Motion, p. 10). Spire Missouri has responded to these questions through its prior discovery and

herein. Accordingly, there is no reason for an order compelling Spire Missouri action at this time.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission deny Constellation's Motion to Compel Discovery for the reasons stated herein.

Respectfully submitted,



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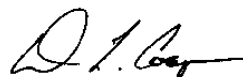
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**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent to the parties by electronic mail this 11<sup>th</sup> day of February, 2022.



Page 73	Page 75
<p>1       <b>Q. (By Mr. Bauer) All right. So --</b></p> <p>2       A. Is that --</p> <p>3       <b>Q. So to prepare to testify as the</b></p> <p>4       <b>representative of Spire on topic number six, you</b></p> <p>5       <b>looked at the documents that were behind tab 12 of</b></p> <p>6       <b>the binders that have been prepared by Spire's</b></p> <p>7       <b>attorneys; is that accurate?</b></p> <p>8       A. That's correct.</p> <p>9       <b>Q. And did you do anything else?</b></p> <p>10      A. Yeah, there really wasn't any other</p> <p>11      information to -- that I needed to understand that</p> <p>12      topic.</p> <p>13      <b>Q. So now I think we might have taken a</b></p> <p>14      <b>slight detour when I was asking about the questions</b></p> <p>15      <b>about the release of the capacity by Spire to the</b></p> <p>16      <b>market during the winter storm. I think you told me</b></p> <p>17      <b>you didn't know -- you didn't know the details of</b></p> <p>18      <b>when it happened and I think you said you don't know</b></p> <p>19      <b>to whom the capacity was released. Is that true?</b></p> <p>20      A. Yeah, I don't recall those off the top</p> <p>21      of my head.</p> <p>22      <b>Q. Okay. Do you know why it was released?</b></p> <p>23      A. It's a common practice. Utilities</p> <p>24      typically hold the majority of the firm in the</p> <p>25      market, and marketers take release capacity from --</p>	<p>1       <b>pipeline?</b></p> <p>2       A. It is.</p> <p>3       <b>Q. Okay.</b></p> <p>4       A. Not supply.</p> <p>5       <b>Q. Okay. So that's -- so that is not</b></p> <p>6       <b>related to the availability and use of storage gas.</b></p> <p>7       <b>That's a totally different topic?</b></p> <p>8       A. That's correct.</p> <p>9       <b>Q. So for releasing capacity, on that</b></p> <p>10      <b>topic, who made the decisions to release capacity to</b></p> <p>11      <b>third parties during the February storm?</b></p> <p>12      MR. GORE: I'm going to object, beyond</p> <p>13      the scope of the notice and beyond the scope of</p> <p>14      topic six, which is where I understand we are.</p> <p>15      <b>Q. (By Mr. Bauer) Do you know?</b></p> <p>16      A. Justin Powers and his team.</p> <p>17      <b>Q. All right. So now let's look at --</b></p> <p>18      <b>let's look at topic six and talk about drawing from</b></p> <p>19      <b>storage or selling gas to third parties. Did -- did</b></p> <p>20      <b>Spire draw from storage and sell gas to any third</b></p> <p>21      <b>parties during February 2021?</b></p> <p>22      MR. GORE: I object, compound, vague.</p> <p>23      A. We -- we had a storage transaction</p> <p>24      where we sold some inventory to another party.</p> <p>25      <b>Q. (By Mr. Bauer) And when did that</b></p>
Page 74	Page 76
<p>1       from the utility to serve other markets. It's</p> <p>2       always on a recallable basis, so we always have the</p> <p>3       ability to recall that capacity if we need it.</p> <p>4       <b>Q. But for this particular event you don't</b></p> <p>5       <b>know why?</b></p> <p>6       MR. GORE: I'm going to object, vague.</p> <p>7       Are we -- are we on topic six?</p> <p>8       MR. BAUER: Yes.</p> <p>9       MR. GORE: Okay. I'm going to object,</p> <p>10      beyond the scope of topic six, and I'm going to</p> <p>11      object, vague as to the term release capacity. I'm</p> <p>12      not sure you and the witness are in agreement on</p> <p>13      that term.</p> <p>14      MR. BAUER: Okay. I was just trying to</p> <p>15      use his word.</p> <p>16      <b>Q. (By Mr. Bauer) What do you mean by</b></p> <p>17      <b>release capacity?</b></p> <p>18      A. Transportation capacity that we hold on</p> <p>19      the pipelines can be -- if -- during times if we're</p> <p>20      not going to necessarily need all of it, we can put</p> <p>21      that in the market and other parties can use that</p> <p>22      capacity on a temporary basis. Like I say, it's</p> <p>23      always recallable, so in the event the utility needs</p> <p>24      it, they can recall that capacity.</p> <p>25      <b>Q. So that's just capacity on the</b></p>	<p>1       <b>happen?</b></p> <p>2       A. On February 15th if I recall.</p> <p>3       <b>Q. And who was involved in that decision?</b></p> <p>4       A. Justin Powers and I.</p> <p>5       <b>Q. Anyone else?</b></p> <p>6       A. I had a conversation with my boss Scott</p> <p>7       Carter to make sure he was aware of it.</p> <p>8       <b>Q. And how much natural gas was involved</b></p> <p>9       <b>in this?</b></p> <p>10      A. 500,000 dekatherms.</p> <p>11      MR. GORE: And Mr. Godat, I would just</p> <p>12      instruct you if you recall these terms specifically,</p> <p>13      that's fine, but if you feel the need reference to</p> <p>14      refresh your recollection, do so.</p> <p>15      THE WITNESS: Okay.</p> <p>16      MR. GORE: I'm impressed that you</p> <p>17      remember them.</p> <p>18      <b>Q. (By Mr. Bauer) And so that was 500</b></p> <p>19      <b>dekatherms?</b></p> <p>20      A. 500,000 dekatherms.</p> <p>21      <b>Q. 500,000 dekatherms, sorry, on</b></p> <p>22      <b>February 15th. To whom was that sold?</b></p> <p>23      A. Atmos.</p> <p>24      <b>Q. Do you know the price?</b></p> <p>25      A. \$200 per dekatherm.</p>



Page 77	Page 79
<p>1 <b>Q. How was that price arrived at?</b></p> <p>2 A. Justin did the transaction, so it would</p> <p>3 have been a negotiated price between Justin and</p> <p>4 Atmos.</p> <p>5 <b>Q. Okay. As the representative of Spire</b></p> <p>6 <b>today, do you know anything about the back and forth</b></p> <p>7 <b>of that negotiation?</b></p> <p>8 A. Like I say, Justin was handling it. I</p> <p>9 don't recall what the big offer price that went --</p> <p>10 it would have went back and forth.</p> <p>11 <b>Q. And was -- the 500,000 dekatherms, was</b></p> <p>12 <b>that the amount that Spire offered for sale</b></p> <p>13 <b>originally?</b></p> <p>14 A. It was the amount that Atmos requested.</p> <p>15 <b>Q. Did Spire propose any different</b></p> <p>16 <b>quantity of natural gas?</b></p> <p>17 A. You know, I don't -- I don't recall a</p> <p>18 different volume being discussed. Justin may have</p> <p>19 had other conversations. I don't -- I don't recall</p> <p>20 another volume.</p> <p>21 <b>Q. And was it determined that Spire did</b></p> <p>22 <b>not need this gas in order to protect its system</b></p> <p>23 <b>integrity?</b></p> <p>24 A. It was.</p> <p>25 <b>Q. And how was that determined?</b></p>	<p>1 A. I'm not sure. I'd have to ask Justin.</p> <p>2 <b>Q. You say this transaction was approved</b></p> <p>3 <b>by your supervisor?</b></p> <p>4 A. I just let him know I was doing it. I</p> <p>5 don't have to have his approval to do it.</p> <p>6 <b>Q. Did you need approval from anyone else</b></p> <p>7 <b>at the company to sell this amount of gas during the</b></p> <p>8 <b>winter storm?</b></p> <p>9 A. I do not.</p> <p>10 <b>Q. Did you consult with anyone other than</b></p> <p>11 <b>Mr. Powers before deciding to sell this gas?</b></p> <p>12 A. I don't recall consulting with anyone,</p> <p>13 like I say, other than I know I ran it past my boss.</p> <p>14 <b>Q. And how does it work when you sell that</b></p> <p>15 <b>amount of gas, where -- where is the gas? Where</b></p> <p>16 <b>does it come from?</b></p> <p>17 A. It's just in our storage inventory.</p> <p>18 It's just sitting in our inventory balance.</p> <p>19 <b>Q. And in any particular location --</b></p> <p>20 A. No.</p> <p>21 <b>Q. -- in the inventory?</b></p> <p>22 A. It's just a paper transfer from our</p> <p>23 storage contract to Atmos's storage contract.</p> <p>24 <b>Q. Is there any daily limit to the amount</b></p> <p>25 <b>that could be taken out of this storage as you were</b></p>
<p style="text-align: right;">Page 78</p> <p>1 A. It gets back to the overall inventory</p> <p>2 question that we had talked about where our</p> <p>3 limitation during that time was our daily withdrawal</p> <p>4 restriction out of storage, not -- we always had</p> <p>5 ample inventory to meet our daily requirement. So</p> <p>6 really, yeah -- it was really just trying to help</p> <p>7 Atmos out because the party that was managing theirs</p> <p>8 had mismanaged it and they were out of storage.</p> <p>9 <b>Q. And this transaction happened on</b></p> <p>10 <b>February 15th. Was the reason for that date -- it's</b></p> <p>11 <b>not going to be a very well asked question. Was the</b></p> <p>12 <b>reason for that -- the transaction happened on that</b></p> <p>13 <b>date, was that when Atmos asked for the gas or was</b></p> <p>14 <b>that when Spire said it had it available or some</b></p> <p>15 <b>other reason?</b></p> <p>16 A. That was when the -- that was when the</p> <p>17 two parties agreed on the transaction.</p> <p>18 <b>Q. So when was the first time that Spire</b></p> <p>19 <b>had 500,000 dekatherms available for sale?</b></p> <p>20 A. Yeah, that's not something we talked</p> <p>21 about ahead of this opportunity. So I don't have</p> <p>22 the answer to that question.</p> <p>23 <b>Q. When Atmos -- when Atmos and Spire</b></p> <p>24 <b>began discussing this transaction, which party</b></p> <p>25 <b>suggested that \$500,000 -- 500,000 dekatherm amount?</b></p>	<p style="text-align: right;">Page 80</p> <p>1 <b>talking about with the Southern Star?</b></p> <p>2 MR. GORE: I'm going to object, vague</p> <p>3 as to whether you're asking him about the gas that</p> <p>4 was sold or the gas that exists in Spire's storage.</p> <p>5 MR. BAUER: I think I'm asking about</p> <p>6 the gas that was sold that existed in Spire's</p> <p>7 storage, right?</p> <p>8 A. Yeah, I think you're misunderstanding</p> <p>9 the transaction. There wasn't -- there wasn't a</p> <p>10 physical withdrawal of gas. It was a paper transfer</p> <p>11 from our inventory to Atmos's inventory. So there</p> <p>12 was no -- there's nothing physically took place</p> <p>13 other than going from our account to Atmos's</p> <p>14 account.</p> <p>15 <b>Q. (By Mr. Bauer) And despite having an</b></p> <p>16 <b>OFO up, Spire concluded that it had this much gas on</b></p> <p>17 <b>paper that it could transfer to someone else?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Explain that to me, please.</b></p> <p>20 A. Yeah, we felt like based on -- based on</p> <p>21 the inventory that we had going into the winter</p> <p>22 period and where our storage inventory was on the</p> <p>23 15th that we were not going to be able to use that</p> <p>24 supply during the month of February. Atmos had a</p> <p>25 need for it. We didn't think it was going to impact</p>

20 (Pages 77 to 80)

<p style="text-align: right;">Page 81</p> <p>1 our operation at all. So it was a win/win for us.  2 Got -- you know, Atmos is a sister utility, got them  3 out of bad shape, and we didn't feel like it was  4 going to impact our operation at all.  5 <b>Q. All right. Let's go on to another</b>  6 <b>topic in Exhibit 1. I think we are up to -- we're</b>  7 <b>up to 2D, but I think may skip that. Let's look at</b>  8 <b>2E if you would, please.</b>  9 A. This ties back to the letter?  10 <b>Q. Ties back to the letter, and actually</b>  11 <b>if you look at it, it ties back to the topic we just</b>  12 <b>skipped, which is -- we skipped 2D, which referred</b>  13 <b>to item six in Mr. Aplington's letter. And then</b>  14 <b>item seven says (quote as read):</b>  15 <b>Symmetry apparently didn't communicate</b>  16 <b>these facts to its customers behind</b>  17 <b>Spire's city gates.</b>  18 <b>So you have to look at number six to</b>  19 <b>know what these facts are on item seven. Does that</b>  20 <b>make sense to you?</b>  21 A. Yes.  22 <b>Q. Great.</b>  23 A. What's the question?  24 <b>Q. There's not one out yet.</b>  25 A. Oh.</p>	<p style="text-align: right;">Page 83</p> <p>1 <b>Q. (By Mr. Bauer) Yeah, so is there a</b>  2 <b>factual basis for that statement?</b>  3 A. Yeah, as I reviewed the information and  4 I look at the daily imbalance calculation for  5 Symmetry, it appears as though their usage stayed  6 consistent and did not -- did not decrease whenever  7 Symmetry's noms went to zero.  8 <b>Q. Okay. And you called it a daily</b>  9 <b>imbalance -- what's the phrase?</b>  10 A. Your daily imbalance calculation. It's  11 the support for the OFO calculation.  12 <b>Q. And so tell me about the daily</b>  13 <b>imbalance calculation. Is that something that gas</b>  14 <b>control does?</b>  15 A. Gas supply.  16 <b>Q. Gas supply. And who is in charge of</b>  17 <b>doing that?</b>  18 A. Justin Powers and his team.  19 <b>Q. And tell me how that calculation is</b>  20 <b>arrived at.</b>  21 MR. GORE: And are we -- are we  22 talking -- I'm going to object, vague. I'm not sure  23 whether you're talking generally or during this  24 particular OFO period.  25 <b>Q. (By Mr. Bauer) I guess I would be</b></p>
<p style="text-align: right;">Page 82</p> <p>1 <b>Q. I was just making sure we were on the</b>  2 <b>same page. So the question is what is Spire's basis</b>  3 <b>for saying that Symmetry apparently didn't</b>  4 <b>communicate facts to its customers behind Spire's</b>  5 <b>city gate?</b>  6 A. Yeah, I mean, Mr. Aplington was the one  7 that wrote the document, but given the fact that  8 Spire -- that Symmetry's customers continued to burn  9 gas as though we weren't in an OFO and Symmetry's  10 volumes were zero, I think it was just pretty  11 obvious that there was some disconnect between  12 Symmetry and its customers.  13 <b>Q. And is there anything other than that</b>  14 <b>observation that supports Spire's position in that?</b>  15 A. Yeah, like I say, I can't speak for  16 Mr. Aplington.  17 <b>Q. Now, in the topic 2F, which is also</b>  18 <b>sort of related, it says (quote as read):</b>  19 <b>Symmetry customers largely did not</b>  20 <b>conserve natural gas during this</b>  21 <b>period.</b>  22 <b>Is that a true statement?</b>  23 MR. GORE: I'm going to object to that  24 as improper corporate rep testimony. I believe the  25 topic relates to the factual basis.</p>	<p style="text-align: right;">Page 84</p> <p>1 <b>interested in knowing if you did it the same way</b>  2 <b>during this OFO period that you normally do it.</b>  3 A. Yeah, there -- there's a sheet -- you  4 know where the OFO calculation sheet is?  5 MR. GORE: We can't testify, but --  6 the --  7 MR. BAUER: You can show him. I mean,  8 you prepared the documents for him. Show him the  9 documents. It's no secret here.  10 MR. GORE: All right. The documents  11 relating to damages calculations are tab one --  12 THE WITNESS: Okay.  13 MR. GORE: -- which is this binder,  14 which is binder --  15 THE WITNESS: Oh, I'm sorry. Sorry, I  16 got too much info running in my head here. I'm a  17 little slow.  18 A. Yeah, so if you go to your -- it's a  19 very simple calculation. It's the nominated  20 quantity that Symmetry had on a daily basis. It's  21 the usage in total of all the customers that  22 Symmetry serves, and the imbalance -- there's a five  23 percent tolerance that's given, so that five percent  24 is backed out and then the difference of those two  25 is the imbalance calculation.</p>

21 (Pages 81 to 84)

<p style="text-align: center;">Page 245</p> <p>1 our gate that we serve. Given the fact that we --</p> <p>2 we don't have any control over the purchases that</p> <p>3 are made by the marketers, so there -- yeah.</p> <p>4 <b>Q. (By Mr. Howell) You have pointed to a</b></p> <p>5 <b>weather forecast, correct, and that's one of the</b></p> <p>6 <b>items in this binder, right?</b></p> <p>7 A. That's correct.</p> <p>8 <b>Q. Beyond the weather forecast that you</b></p> <p>9 <b>received did you personally look at -- did you</b></p> <p>10 <b>personally review the weather forecast?</b></p> <p>11 A. I don't know if I personally reviewed</p> <p>12 that weather forecast prior to looking what was</p> <p>13 turned over. You know, definitely had conversations</p> <p>14 with -- with Justin Powers about what he was seeing</p> <p>15 kind of from a historical perspective of demand on</p> <p>16 the system.</p> <p>17 <b>Q. And by that what do you mean, that when</b></p> <p>18 <b>it gets colder people use more gas?</b></p> <p>19 A. Yeah, just the high -- the high level</p> <p>20 of demand that we were going to see on our system,</p> <p>21 you know, which -- which is troubling anytime. It's</p> <p>22 especially troubling in late February when not -- a</p> <p>23 lot of storage holders weren't -- you know, weren't</p> <p>24 near as conservative as what we are. And I think we</p> <p>25 found out that a lot of other storage holders went</p>	<p style="text-align: center;">Page 247</p> <p>1 <b>a quantitative analysis to determine whether or not</b></p> <p>2 <b>to issue an OFO, and if so, for which segments?</b></p> <p>3 MR. GORE: All right. I'm going to</p> <p>4 object to the question as an incomplete statement of</p> <p>5 the witness's testimony as already given. You</p> <p>6 listed two things, but the witness has listed much</p> <p>7 more than that. I'm going to object to the question</p> <p>8 as vague in terms of the use of the term</p> <p>9 quantitative. And I'm going to object, compound and</p> <p>10 foundation. You can answer.</p> <p>11 A. Yeah, I mean, like I mentioned, we had</p> <p>12 concern that production wasn't going to be</p> <p>13 available. We had concern that, you know, the</p> <p>14 temperature -- the temperature that was forecasted</p> <p>15 was going to have us close to peak demand, and the</p> <p>16 upstream pipelines were in OFOs. So there's not a</p> <p>17 lot more to it than that.</p> <p>18 <b>Q. (By Mr. Howell) Okay. Respectfully,</b></p> <p>19 <b>that's not an answer to the question that I asked.</b></p> <p>20 <b>The question I asked concerned whether you looked at</b></p> <p>21 <b>any Spire spreadsheet, analysis, data, anything that</b></p> <p>22 <b>addressed this issue of demand -- projected demand</b></p> <p>23 <b>increase.</b></p> <p>24 A. I --</p> <p>25 MR. GORE: Let me object. I'm going to</p>
<p style="text-align: center;">Page 246</p> <p>1 into the month with their storage almost depleted.</p> <p>2 We knew storage levels across the</p> <p>3 country were low. So if you have a peak situation</p> <p>4 in mid-February it's a completely different</p> <p>5 situation than if you have a peak -- peak demand</p> <p>6 situation in December when storage inventories are</p> <p>7 full.</p> <p>8 You know, and I think that come to</p> <p>9 fruition halfway through -- halfway through the</p> <p>10 polar vortex. You know, folks like Atmos and others</p> <p>11 had completely depleted their storage inventories.</p> <p>12 I don't know if they did, but the marketers that</p> <p>13 were managing it had depleted it.</p> <p>14 So like I say, there was a whole host</p> <p>15 of concerns that -- that went into it that weren't</p> <p>16 -- that weren't analysis driven. It was driven by</p> <p>17 information that Justin and his team had about the</p> <p>18 market at that time.</p> <p>19 <b>Q. Okay. You've told me about -- as far</b></p> <p>20 <b>as quantitative issues, you told me about weather</b></p> <p>21 <b>forecasts, and there's one that you provided in the</b></p> <p>22 <b>binder. You also mentioned historical data about</b></p> <p>23 <b>demand increases. Did you personally look at any</b></p> <p>24 <b>document, spreadsheet, analysis, anything either on</b></p> <p>25 <b>Spire's system or elsewhere that you used as part of</b></p>	<p style="text-align: center;">Page 248</p> <p>1 object because you just asked a completely different</p> <p>2 question and framed it as a question that you</p> <p>3 previously asked. So I object to that misstatement.</p> <p>4 The current question I'm going to object to as</p> <p>5 compound and lacking foundation. You can answer.</p> <p>6 A. Yeah, I mean, that being, what, six,</p> <p>7 eight months ago, I can't recall exactly everything</p> <p>8 I looked at. I know Justin and I had a lot of</p> <p>9 conversations about what he was seeing in the</p> <p>10 forecast from a demand perspective.</p> <p>11 So I know we definitely spent ample</p> <p>12 time talking about what we saw, you know, as</p> <p>13 potential usage on the system. Now, whether I</p> <p>14 looked at the specific spreadsheet or he was giving</p> <p>15 me numbers, I don't recall that from, you know,</p> <p>16 months ago.</p> <p>17 <b>Q. (By Mr. Howell) You also mentioned</b></p> <p>18 <b>production drops. I want to ask you about that.</b></p> <p>19 <b>What production data did you have -- did Spire have</b></p> <p>20 <b>that identified or indicated or projected production</b></p> <p>21 <b>drops?</b></p> <p>22 MR. GORE: I'm going to -- I'm going to</p> <p>23 object, asked and answered. You can answer again.</p> <p>24 A. Yeah, I mean, I notice -- I notice this</p> <p>25 one in Gas Daily. Like I say, a lot of it was</p>

62 (Pages 245 to 248)

Page 273	Page 275
<p>1 A. That's correct.</p> <p>2 <b>Q. Did Spire ever during February 2021</b></p> <p>3 <b>reach or attempt to reach the MDQ?</b></p> <p>4 MR. GORE: I'm going to object, vague,</p> <p>5 foundation. You can answer.</p> <p>6 A. What time period did you ask about?</p> <p>7 <b>Q. (By Mr. Howell) Yeah. So I'm trying</b></p> <p>8 <b>to figure out, you have all this gas in storage.</b></p> <p>9 <b>You say that it's really conservative that you have</b></p> <p>10 <b>all this gas that's just sitting there to protect</b></p> <p>11 <b>your system. What I'm trying to find out is if you</b></p> <p>12 <b>have the gas sitting there and obviously you sold</b></p> <p>13 <b>some of it to Atmos, but did you try to draw out the</b></p> <p>14 <b>gas, did you try to remove the gas, the physical</b></p> <p>15 <b>molecules from storage so that it could come onto</b></p> <p>16 <b>your system and protect your system integrity? So</b></p> <p>17 <b>with that kind of background, what I'm trying to</b></p> <p>18 <b>find out is did Spire at any time during</b></p> <p>19 <b>February 2021 attempt to use its full MDQ for any</b></p> <p>20 <b>day from storage?</b></p> <p>21 MR. GORE: I'm going to object, move to</p> <p>22 strike the commentary that preceded the question and</p> <p>23 object to the question as compound.</p> <p>24 A. Justin was the one actually determining</p> <p>25 the actual daily volumes. You know, what I gathered</p>	<p>1 <b>that you couldn't tell me, but sitting here today</b></p> <p>2 <b>are you aware of any day on which Spire either --</b></p> <p>3 A. Let me -- I mean, to answer that we --</p> <p>4 MR. GORE: I don't know if there's a</p> <p>5 question pending.</p> <p>6 THE WITNESS: All right.</p> <p>7 <b>Q. (By Mr. Howell) Yeah, yeah, yeah.</b></p> <p>8 <b>Okay. I think I have one or two other questions</b></p> <p>9 <b>about storage. With respect to the 500,000</b></p> <p>10 <b>dekatherms that were sold to Atmos, you mentioned</b></p> <p>11 <b>that in response to questioning from Mr. Bauer,</b></p> <p>12 <b>correct?</b></p> <p>13 A. That's correct.</p> <p>14 <b>Q. And you sold 500,000 dekatherms at a</b></p> <p>15 <b>price of \$200 per dekatherm, correct?</b></p> <p>16 A. That's correct.</p> <p>17 <b>Q. That's \$100 million?</b></p> <p>18 A. That's correct.</p> <p>19 <b>Q. Did Spire credit its rate base from the</b></p> <p>20 <b>profit made from the Atmos sale?</b></p> <p>21 MR. GORE: I'm going to object --</p> <p>22 object, lack of foundation. You can answer.</p> <p>23 A. We -- we handled it through our</p> <p>24 off-system sales mechanism that's in the tariff.</p> <p>25 <b>Q. (By Mr. Howell) Could you explain that</b></p>
<p>Page 274</p> <p>1 from him in conversations was that from a planning</p> <p>2 perspective, storage -- storage is the one buffer</p> <p>3 that keeps us from being short on Southern Star. So</p> <p>4 from a planning perspective he -- he felt like he</p> <p>5 maximized his storage withdrawals to the fullest</p> <p>6 extent possible through that whole period of time.</p> <p>7 That's where I got back talking to</p> <p>8 Mr. Bauer that if you -- if you look with perfect</p> <p>9 hindsight, you know, would it say that you maximized</p> <p>10 every dekatherm, you know, the question is -- the</p> <p>11 answer is probably no, but I think the team was</p> <p>12 confident that they were maximizing that to the</p> <p>13 fullest extent possible to -- to minimize the amount</p> <p>14 of gas that our firm customers were having to buy.</p> <p>15 <b>Q. (By Mr. Howell) Okay. So your team</b></p> <p>16 <b>felt that they were maximizing that asset. I'm</b></p> <p>17 <b>asking kind of a different question about</b></p> <p>18 <b>quantitatively did you actually maximize use of</b></p> <p>19 <b>those physical molecules. Was there ever even one</b></p> <p>20 <b>single day that you used the MDQ that you were</b></p> <p>21 <b>allowed under the Spire agreement?</b></p> <p>22 MR. GORE: I'm going to object, vague.</p> <p>23 A. Yeah, I couldn't tell you if we</p> <p>24 actually reached the MDQ on any given day.</p> <p>25 <b>Q. (By Mr. Howell) I know you're saying</b></p>	<p>Page 276</p> <p>1 <b>answer?</b></p> <p>2 A. Yeah, there's -- there's a sharing</p> <p>3 mechanism for that activity. Yeah, I don't -- I</p> <p>4 don't recall the exact sharing under that agreement.</p> <p>5 So the dollars were shared -- the majority of the</p> <p>6 dollars go to the ratepayers and then Spire gets a</p> <p>7 portion of that.</p> <p>8 <b>Q. And what day of the winter storm did</b></p> <p>9 <b>that occur on?</b></p> <p>10 A. The transfer took place on</p> <p>11 February 15th if I recall.</p> <p>12 <b>Q. And so that was three days after the --</b></p> <p>13 <b>the OFO was issued and, what, another four days</b></p> <p>14 <b>before you could even consider terminating the OFO,</b></p> <p>15 <b>correct?</b></p> <p>16 A. That's correct.</p> <p>17 <b>Q. And so at that point in time during the</b></p> <p>18 <b>winter storm Spire determined that rather than using</b></p> <p>19 <b>that 500,000 dekatherms of gas for its own system</b></p> <p>20 <b>and its own customers, that it was a better decision</b></p> <p>21 <b>to sell that gas to a third party so that third</b></p> <p>22 <b>party could use it?</b></p> <p>23 MR. GORE: I'm going to object,</p> <p>24 foundation, misstates prior testimony, assumes facts</p> <p>25 not in evidence, compound if I didn't say that. You</p>

69 (Pages 273 to 276)

Page 277	Page 279
<p>1 can answer the question.</p> <p>2 A. Yeah. Like I mentioned, given our</p> <p>3 overall inventory level and the fact that that had</p> <p>4 no bearing on what our daily limitations were,</p> <p>5 Justin is -- Justin and his team determined that he</p> <p>6 was not going to be able to use the 500,000</p> <p>7 dekatherms of inventory during the cold period.</p> <p>8 Atmos was in a dire situation because</p> <p>9 from what we understood their marketer had</p> <p>10 mismanaged their -- their storage capacity and, you</p> <p>11 know, had not only ran out of storage, but actually</p> <p>12 overran it.</p> <p>13 So them being a sister utility, we kind</p> <p>14 of raised to the call and thought we did a win-win</p> <p>15 deal for them when it was an asset that we weren't</p> <p>16 going to be able to use anyway. So we went ahead</p> <p>17 and executed the transaction.</p> <p>18 <b>Q. (By Mr. Howell) All right. Do you</b></p> <p>19 <b>know what Atmos did with the gas?</b></p> <p>20 MR. GORE: I'm going to -- I'm going to</p> <p>21 object as beyond the scope of the 30(b)(6) -- of the</p> <p>22 corporate representative notice. Also, it's a</p> <p>23 question about a subject matter that this witness</p> <p>24 isn't qualified to answer. That being said, you</p> <p>25 can -- you can answer if you know.</p>	<p>1 would be great.</p> <p>2 THE WITNESS: Seven? Tab seven?</p> <p>3 MR. HOWELL: Mr. Godat, this was an</p> <p>4 exhibit that Mr. Bauer offered during his</p> <p>5 examination.</p> <p>6 MR. APLINGTON: I think it's 8.</p> <p>7 MR. HOWELL: There was an e-mail that</p> <p>8 Spire sent to all the customers.</p> <p>9 MR. GORE: Can you say what's at the --</p> <p>10 at the top of the document? Is it MOW</p> <p>11 Transportation Comms 2-17-21, is that the document</p> <p>12 you're referring to? What's at the top of the</p> <p>13 document?</p> <p>14 MR. HOWELL: Yes, sir. I --</p> <p>15 MR. GORE: Okay.</p> <p>16 MR. HOWELL: -- apologize. I'm trying</p> <p>17 to pull it up and confirm that with you.</p> <p>18 THE WITNESS: I see the document.</p> <p>19 <b>Q. (By Mr. Howell) During the questioning</b></p> <p>20 <b>you were asked if this e-mail was sent to -- to</b></p> <p>21 <b>Symmetry customers. Did a -- did this letter or</b></p> <p>22 <b>e-mail also go to Constellation customers as well?</b></p> <p>23 MR. GORE: What? I'm not sure it's</p> <p>24 clear in the record what we're looking at. We've</p> <p>25 got -- we've got Exhibit 8, but I'm not at all sure</p>
<p>Page 278</p> <p>1 A. I don't know anything beyond the -- the</p> <p>2 transaction where the inventory was transferred on</p> <p>3 paper from our account to Atmos's account.</p> <p>4 <b>Q. (By Mr. Howell) You mentioned a minute</b></p> <p>5 <b>ago that there was a -- a tariff mechanism for</b></p> <p>6 <b>splitting the hundred million dollar revenue event</b></p> <p>7 <b>between ratepayers and Spire Missouri. What share</b></p> <p>8 <b>of that hundred million dollars did Spire get?</b></p> <p>9 A. I'm pretty sure it's 25 percent.</p> <p>10 <b>Q. 25 percent plus -- 25 plus on the</b></p> <p>11 <b>profit plus the return of its cost basis?</b></p> <p>12 A. It's 25 percent of the net margin on</p> <p>13 the deal. So it would be sale less cost. Excuse</p> <p>14 me.</p> <p>15 MR. HOWELL: If I can just go on mute</p> <p>16 for one second, I'm going to check my notes really</p> <p>17 fast and I think I can be done.</p> <p>18 (WHEREIN, a discussion was held off the</p> <p>19 record.)</p> <p>20 MR. HOWELL: All right. Are you ready?</p> <p>21 There's one other document I need to ask about.</p> <p>22 Ryan, there was an e-mail that Mr. Bauer used that</p> <p>23 Spire sent to the customers. I do not have the</p> <p>24 exact number. I think it might have been 6 or 7.</p> <p>25 If you can locate that quickly and bring it up, that</p>	<p>Page 280</p> <p>1 that you're referencing Exhibit 8.</p> <p>2 THE WITNESS: Do you know if this is in</p> <p>3 our binder?</p> <p>4 MR. HOWELL: I'd like to pass the</p> <p>5 witness.</p> <p>6 THE WITNESS: Okay.</p> <p>7 MR. GORE: Are you referencing the</p> <p>8 document that's at tab 17, whatever binder? 18 --</p> <p>9 so we think you're referencing a document that's at</p> <p>10 18M of our binder. That's a different e-mail than</p> <p>11 this one.</p> <p>12 THE WITNESS: This may have just went</p> <p>13 to Symmetry customers.</p> <p>14 MR. GORE: Actually, scratch that. The</p> <p>15 Exhibit 8 used today in Bauer's -- Mr. Bauer's</p> <p>16 questioning is not the same as 18M, so we were wrong</p> <p>17 about that. So I'm not sure whether we're using</p> <p>18 Exhibit 8 from Mr. Bauer's questioning or something</p> <p>19 else.</p> <p>20 MR. HOWELL: Well, with respect to</p> <p>21 Exhibit 8 from Mr. Bauer's questioning, if Ryan can</p> <p>22 put that up on the screen, I think that can resolve</p> <p>23 this immediately. Yes, this was the document that I</p> <p>24 was referring to.</p> <p>25 <b>Q. (By Mr. Howell) I believe you</b></p>

70 (Pages 277 to 280)

Page 41	Page 43
<p>1 and gas control. So Alex and his staff.</p> <p>2 <b>Q. How do -- how do those groups</b></p> <p>3 <b>communicate with each other within Spire?</b></p> <p>4 MR. GORE: I'm going to object, vague.</p> <p>5 You can answer.</p> <p>6 A. Gas control actually sends the forecast</p> <p>7 over showing what our -- excuse me -- based on the</p> <p>8 temperature forecast what our system demand is going</p> <p>9 to be, but in general they spend a lot of time on</p> <p>10 phone conversations and situations like this.</p> <p>11 <b>Q. (By Mr. Bauer) Were their documents</b></p> <p>12 <b>collected for this case?</b></p> <p>13 MR. GORE: I'm going to object, vague.</p> <p>14 A. Yeah, I think that's a given.</p> <p>15 <b>Q. (By Mr. Bauer) Meaning that -- I'll</b></p> <p>16 <b>respond. It was a vague question. I'll make it a</b></p> <p>17 <b>little tighter.</b></p> <p>18 <b>Were documents related to the winter</b></p> <p>19 <b>storm collected from the persons who were involved</b></p> <p>20 <b>in monitoring the gas market forecasts for Spire?</b></p> <p>21 A. They were.</p> <p>22 MR. GORE: I'm going to object. I'll</p> <p>23 object, vague. You can answer.</p> <p>24 A. Okay. Yeah, they were.</p> <p>25 <b>Q. (By Mr. Bauer) And were all the</b></p>	<p>1 MR. GORE: And George, I just instruct</p> <p>2 you look at the letter and read it --</p> <p>3 THE WITNESS: Yeah.</p> <p>4 MR. GORE: -- in context of the letter</p> <p>5 before you answer. Thank you.</p> <p>6 A. Yeah. It's giving notice to the</p> <p>7 marketers that we're in an OFO situation.</p> <p>8 <b>Q. (By Mr. Bauer) And what is the purpose</b></p> <p>9 <b>of an OFO?</b></p> <p>10 A. It is to protect the integrity of our</p> <p>11 system and it is to make sure that we stay in</p> <p>12 compliance with our upstream pipelines.</p> <p>13 <b>Q. Any other purposes?</b></p> <p>14 A. Yeah, it's basically since the utility</p> <p>15 has no control over the supply that's -- that's</p> <p>16 brought in to serve the marketers, it's to make sure</p> <p>17 that the marketers are doing their part to bring</p> <p>18 that supply in.</p> <p>19 MS. BAIRD: I'm sorry, Steve, to</p> <p>20 interrupt. This is Amy. I'm having a little</p> <p>21 trouble hearing the witness. He keeps dropping his</p> <p>22 voice a little. Can you guys make an effort,</p> <p>23 please, to either get him closer or have him speak</p> <p>24 up?</p> <p>25 THE WITNESS: I'll try to speak up. I</p>
<p>1 <b>responsive documents from those groups produced to</b></p> <p>2 <b>us in this case?</b></p> <p>3 A. Like I mentioned before, it's my</p> <p>4 understanding that if someone was asked to produce</p> <p>5 documents, they produced the documents.</p> <p>6 <b>Q. Now, do these folks in gas control, do</b></p> <p>7 <b>they have any means for communicating with each</b></p> <p>8 <b>other other than by telephone?</b></p> <p>9 A. They do. The forecasts that they send</p> <p>10 out to gas supply, the forecast was actually one of</p> <p>11 the documents that's included in this binder.</p> <p>12 <b>Q. And do they communicate by -- by e-mail</b></p> <p>13 <b>or by some other way?</b></p> <p>14 A. Typically by e-mail.</p> <p>15 <b>Q. In February 2021, were those folks</b></p> <p>16 <b>working remotely or were they on-site here at Spire?</b></p> <p>17 A. The controllers themselves were</p> <p>18 on-site.</p> <p>19 <b>Q. All right. Let's go to topic 2B,</b></p> <p>20 <b>please. Here it says (quote as read):</b></p> <p>21 <b>Spire reacted by initiating an OFO to</b></p> <p>22 <b>all marketers for the projected start</b></p> <p>23 <b>of the storm and short market.</b></p> <p>24 <b>It says initiating an OFO. What does</b></p> <p>25 <b>that entail?</b></p>	<p>1 apologize.</p> <p>2 MS. BAIRD: Thank you.</p> <p>3 <b>Q. (By Mr. Bauer) Okay. So are there</b></p> <p>4 <b>procedures in place for Spire on when to declare an</b></p> <p>5 <b>OFO and when not to?</b></p> <p>6 A. Procedure-wise, I mean, there's a lot</p> <p>7 of things that the utilities have to do to stay in</p> <p>8 compliance with their tariff, and not everything is</p> <p>9 written down in a formal procedure. So the tariff</p> <p>10 itself is the guidepost for gas supply making the</p> <p>11 decision to go into an OFO.</p> <p>12 <b>Q. So Spire does not have any other</b></p> <p>13 <b>internal procedures related to whether or not to go</b></p> <p>14 <b>into an OFO; is that true?</b></p> <p>15 A. Yeah, we don't have a formal procedure</p> <p>16 for that, correct.</p> <p>17 <b>Q. Okay. So who was involved in the</b></p> <p>18 <b>decision whether to declare an OFO?</b></p> <p>19 MR. GORE: I'm going to object. Are</p> <p>20 you -- vague. And I would just ask you to specify</p> <p>21 whether you're talking about the present matter.</p> <p>22 MR. BAUER: Absolutely right.</p> <p>23 <b>Q. (By Mr. Bauer) Who was involved at --</b></p> <p>24 <b>at Spire in February of 2021 in deciding when and</b></p> <p>25 <b>whether to have an OFO?</b></p>

11 (Pages 41 to 44)

<p style="text-align: right;">Page 45</p> <p>1 A. It was primarily Justin Powers who 2 oversees gas supply and myself. I did -- I did 3 consult with Scott Carter, my boss, but ultimately I 4 was the one that made the decision. 5 <b>Q. That was my next question. Did you 6 need approval from anyone above you for that 7 decision or does the buck stop with you?</b> 8 A. It stops with me. 9 <b>Q. Was there any debate within Spire about 10 when to initiate an OFO?</b> 11 MR. GORE: I'm going to object to the 12 term debate as vague. Go ahead and answer. 13 A. Yeah, it was actually -- the timing 14 fell in to where it didn't even require a lot of 15 debate. You know, on that Monday and Tuesday we 16 were seeing -- we were seeing the supply situation 17 deteriorate. 18 We were starting to see -- we were 19 starting to have concern that supply was going to 20 disappear and then Southern Star issued their OFO on 21 the 9th. So after reviewing that we -- we moved in 22 lockstep and issued ours on the 10th, effective for 23 the same gas date, nine a.m. on the 12th. 24 <b>Q. (By Mr. Bauer) How did Southern Star's 25 OFO factor into Spire's decision whether or not to</b></p>	<p style="text-align: right;">Page 47</p> <p>1 <b>e-mail?</b> 2 MR. GORE: I'm going to -- I'm going to 3 object, calls for speculation. You can answer. 4 A. Yeah, I mean, there's documents in here 5 that talk about specifically the issues that we were 6 having in Southwest Missouri where we were losing 7 supply on the Southern Star system. We initiated 8 our incident support team because we were preparing 9 for outages in Southwest Missouri. There was a 10 media campaign. 11 We provided the pressure profile on the 12 Southern Star system in Southwest Missouri where you 13 could see we were -- we were dramatically losing 14 pressure over a short amount of time. So that 15 information has been provided. 16 MR. GORE: And Mr. Godat, I would just 17 ask just for the record, when you reference the 18 binder, could you be specific? Rather than say 19 here, say in the binders that I -- that have been 20 produced at the deposition today just to make clear 21 on the record what you're referring to. 22 THE WITNESS: Yes, sir. Thanks. 23 <b>Q. (By Mr. Bauer) What actions, if any, 24 did Spire take to prepare for the winter storm other 25 than issuing the OFO?</b></p>
<p style="text-align: right;">Page 46</p> <p>1 <b>declare an OFO?</b> 2 A. It just reinforced to us that it was 3 absolutely necessary to do. 4 <b>Q. Are there any documents at Spire 5 indicating that anyone believed that the OFO was 6 unnecessary?</b> 7 A. I'm not aware of any of those 8 documents. 9 <b>Q. Are there any documents within Spire 10 indicating that Spire's system integrity was not at 11 risk at the time that the OFO was declared?</b> 12 A. I'm not aware of those documents. 13 <b>Q. Are there any documents in Spire 14 indicating that anyone believed that the system 15 integrity was not at risk during any time during 16 which the OFO was in place?</b> 17 MR. GORE: I'm going to object, vague 18 and compound. 19 A. Yeah, I mean, to the contrary, there 20 was -- there was actually a lot of concern during 21 Winter Storm Uri about the integrity of the system 22 in Kansas City. 23 <b>Q. (By Mr. Bauer) And since I'm asking 24 you about documents on this line of questions, who 25 were -- do any of those people communicate by</b></p>	<p style="text-align: right;">Page 48</p> <p>1 A. You know, that's one thing I think -- 2 you know, the utility -- Spire as a whole, you know, 3 especially our gas supply team prides their self on 4 as far as preparedness. We run a lot of regression 5 analysis to -- where we have, you know, a very firm 6 grasp on what our firm requirements are going to be. 7 You know, we clearly understand the 8 limitations of our transportation agreements that we 9 have, you know, specifically the Southern Star 10 system has -- has a flowing gas requirement that's 11 tied to its storage agreements, you know, so yeah, 12 there's a lot of preparation. The firm gas supply 13 contracts that the utility enters into ahead of the 14 winter. So yeah, there's -- as a utility that's 15 probably the main focus for the company is just 16 winter preparedness. 17 <b>Q. So you mentioned regression analyses. 18 What are those?</b> 19 A. That's where we would look at 20 historical usage information as compared to -- and 21 see how that relationship ties to forecasted 22 temperatures. And then we can estimate what our 23 demand is going to be based on that -- the forecasts 24 that we get. 25 <b>Q. And so those are computer models that</b></p>

12 (Pages 45 to 48)

Page 249	Page 251
<p>1 driven around the conversation that Justin was 2 having --</p> <p>3 MR. GORE: Could you -- could you 4 reference the page of Gas Daily? I want you to 5 really describe in the record exactly what you're 6 looking at.</p> <p>7 THE WITNESS: Yeah, tab E, 1E, page 8 three, the Gas Daily from February 12th.</p> <p>9 MR. GORE: Okay. Could you do me a 10 favor? Could you highlight exactly what you're 11 looking at, the whole thing? And describe it as 12 you -- well, if you could just highlight it because 13 I just want to be clear in the record.</p> <p>14 A. Yeah. Like I say, here this is 15 physical evidence of all the conversations that 16 Justin was having with the upstream producers and 17 with the pipelines. I think this -- this is 18 actually showing it quantified on a piece of paper. 19 You know, he --</p> <p>20 <b>Q. (By Mr. Howell) Mr. Godat --</b> 21 A. -- he wasn't --</p> <p>22 <b>Q. -- did you have --</b> 23 A. I'm sorry.</p> <p>24 <b>Q. You do not have a time machine and you</b> 25 <b>could not have possibly looked at this February 12th</b></p>	<p>1 of the conversations that Justin was having leading 2 up to that time.</p> <p>3 He didn't have producers that was -- 4 that were physically giving him production data and 5 he didn't have -- you know, the pipeline wasn't 6 giving him production data, but he was having a lot 7 of conversations about what was physically going on 8 in the market, which is -- for anybody that's been 9 in the market, you realize that's where you find out 10 your information about what's going on is through 11 those conversations.</p> <p>12 So that's what I say, people are 13 disappointed -- or counterparties are disappointed 14 that there's not a bunch of detailed analysis, but 15 that wasn't required given the facts that were going 16 on at that time.</p> <p>17 <b>Q. (By Mr. Howell) Have you completed</b> 18 <b>your answer?</b> 19 A. Yes.</p> <p>20 <b>Q. This tab 1E document did not exist at</b> 21 <b>9:10 -- or 9:20 a.m. on February 10th, correct?</b> 22 A. That's correct.</p> <p>23 <b>Q. This is all -- any -- any document that</b> 24 <b>you reference that was created after February 10th</b> 25 <b>at 9:20 a.m. when the notice was issued would be an</b></p>
<p style="text-align: center;">Page 250</p> <p>1 <b>document when you issued an OFO on February 10th.</b> 2 <b>What production data did you have on or before</b> 3 <b>February 10th that addressed a production drop?</b></p> <p>4 MR. GORE: Okay. He's not going to 5 answer that question because I think the record's 6 pretty clear that he wasn't finished asking -- 7 answering the question that you asked him. Do you 8 remember where you were cut off?</p> <p>9 A. Yeah, that's where I'm telling you that 10 there's not a bunch of analysis and data that we 11 had. It was conversations that Justin was having 12 with our upstream supplies and pipeline. I pointed 13 to this --</p> <p>14 MR. GORE: And could you just be clear 15 about what you're pointing to when you say this?</p> <p>16 A. I pointed -- I pointed to -- I pointed 17 to the document in the Gas Daily daily on tab 1E, 18 page three.</p> <p>19 MR. GORE: What is it on page three 20 you're referencing? I just need to be clear in the 21 record.</p> <p>22 A. It's the production data that shows the 23 huge decline in production volumes in the 24 midcontinent region, which is what serves Southern 25 Star. I pointed to that to just show physical proof</p>	<p style="text-align: center;">Page 252</p> <p>1 <b>after-the-fact document that would either confirm or</b> 2 <b>refute a decision that you chose to make before that</b> 3 <b>time, correct?</b></p> <p>4 MR. GORE: I'm going to object, 5 compound, lack of foundation. You can answer.</p> <p>6 A. I think I've been clear that I'm not -- 7 I'm not saying it's information I had at the time. 8 I'm saying the information that we were collecting 9 was through conversations that Justin's team was 10 having with his counterparties. All I was saying is 11 that the information that you're trying to extract 12 from us that doesn't exist is just confirmed in this 13 graph on Exhibit 1E, page 12.</p> <p>14 <b>Q. (By Mr. Howell) So --</b> 15 MR. GORE: Could I -- could I just get 16 a clarification for the record? You said page 12? 17 THE WITNESS: Or I'm sorry, 1E, page 18 three.</p> <p>19 MR. GORE: Thank you. 20 THE WITNESS: Sorry.</p> <p>21 <b>Q. (By Mr. Howell) You mentioned</b> 22 <b>conversations that Justin told you that he had with</b> 23 <b>other people about production and potential</b> 24 <b>production drops. Are you saying that you -- when</b> 25 <b>you decided to issue the OFO, the factor you were</b></p>

63 (Pages 249 to 252)



<p style="text-align: center;">Page 253</p> <p>1 <b>considering with regard to production was your</b>  2 <b>reliance on Justin's conversations about production</b>  3 <b>drops that could occur in the future?</b>  4 MR. GORE: I'm going to object,  5 compound. You can answer.  6 A. Yeah, I think -- I think I've been  7 clear that it was the conversations that he was  8 having about production drops that were taking place  9 at the time and the fear of them getting worse, and  10 then combined with the fact that NGPL, Enable,  11 Panhandle, Southern Star all issued OFOs. It was --  12 yeah, it -- anybody in the market knew the situation  13 was getting bad.  14 <b>Q. (By Mr. Howell) Are you aware of any</b>  15 <b>production drops that actually occurred as of</b>  16 <b>February 9th?</b>  17 A. Justin Powers would have to answer  18 those questions.  19 <b>Q. Are you aware of any production drops</b>  20 <b>that occurred as of February 10th?</b>  21 MR. GORE: So let me -- can I just get  22 a clarification of your question? When you're  23 saying as of, are you saying as he sits here today  24 does he know of production drops that occurred as of  25 that date or are you saying -- you're not being</p>	<p style="text-align: center;">Page 255</p> <p>1 tell you it was a real world conversation about the  2 issues he was -- that he was seeing.  3 You know, ultimately -- I mean, he --  4 Justin is -- is responsible for gas supply. I think  5 we've said that multiple times. I've got 1100  6 employees under me, so I'm not in the details of  7 those individual conversations, but he kept me fully  8 apprised of -- of the situation that he was seeing.  9 And then -- and then those were all --  10 like I say, those were all -- they were all  11 confirmed with all of the OFOs that were being  12 issued by all the pipelines.  13 <b>Q. The next thing you mentioned was</b>  14 <b>storage levels. You said -- you said something to</b>  15 <b>the effect that you thought Spire had a conservative</b>  16 <b>storage level, but you thought other people did not.</b>  17 <b>Was there any data or report or documents, e-mails,</b>  18 <b>anything tangible that you reviewed regarding the</b>  19 <b>status of storage levels?</b>  20 A. Like I say, I was relying on  21 information that I was getting from Justin.  22 <b>Q. And what information did Justin provide</b>  23 <b>to you regarding the status of storage levels up to</b>  24 <b>and including February 9th and 10th when you made</b>  25 <b>this OFO decision?</b></p>
<p style="text-align: center;">Page 254</p> <p>1 clear as to whether you're asking him to go back in  2 time or whether you're asking him presently.  3 MR. HOWELL: Well, I'm trying to  4 determine not based on things that he knows about  5 days or weeks or months later, but what the  6 information was in front of him when he made the  7 decision, and I'm trying to determine with this  8 question whether he had seen any information --  9 otherwise received any information that production  10 drops had actually occurred, that there were  11 production drops as of the February 9th or 10th.  12 MR. GORE: So can we -- can we get a  13 question that just specifies whether you want him to  14 rely on present knowledge or knowledge he had at the  15 time? That's the only clarification I want in the  16 record.  17 <b>Q. (By Mr. Howell) Sure. Mr. Godat,</b>  18 <b>based on information that you had as of February --</b>  19 <b>the morning of February 10th, 2021, had you seen or</b>  20 <b>heard from Justin or anyone else information</b>  21 <b>confirming that production drops had already begun?</b>  22 A. Yeah, I'm confident -- I'm confident at  23 the time that he was giving me real world examples  24 of issues that he was hearing about. To say that I  25 know exactly what each of those are, no, but I can</p>	<p style="text-align: center;">Page 256</p> <p>1 A. Yeah, I don't know that I recall  2 specific information on the day that we made the  3 decision.  4 <b>Q. Other than Justin and I believe you</b>  5 <b>also mentioned Scott Carter, that you had a</b>  6 <b>conversation with both of them about the decision to</b>  7 <b>issue the OFO before it was issued, was there anyone</b>  8 <b>else that you spoke with that informed your decision</b>  9 <b>of whether or not to issue an OFO --</b>  10 MR. GORE: I'm going to object --  11 <b>Q. (By Mr. Howell) -- for the Spire</b>  12 <b>Missouri system?</b>  13 MR. GORE: I'm going to object,  14 compound, misstates prior testimony, misstates what  15 this witness has testified about about Scott  16 Carter's role in this whole thing. You can -- you  17 can answer the question if you understand it.  18 A. Yeah, like I said, Justin and I were  19 the ones that had the conversation, and then I -- I  20 informed my boss, Mr. Carter, before we actually  21 issued the OFO.  22 <b>Q. (By Mr. Howell) Was there anyone else</b>  23 <b>that you consulted with prior to making the</b>  24 <b>decision, the determination that you would -- that</b>  25 <b>Spire would issue an OFO for the Spire Missouri West</b></p>

64 (Pages 253 to 256)

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

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

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

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

Spire provided objections to these data requests by letter dated January 19, 2022.

The below responses are provided without waiving those objections.

3.1. Describe in detail the actions Spire took to ensure that correspondence, documents, and other materials relating to the Winter Storm Event or this Action were preserved, and when each such action was taken.

**RESPONSE:** Please see the attached correspondence.

3.2. Produce all correspondence, documents and other materials – authored by you or received from any other source - which directed Spire employees, agents, officers, directors, representatives, or any other person or persons acting in concert with Spire or under Spire’s control to preserve documents, correspondence or other materials relating to the Winter Storm Event or this Action.

**RESPONSE:** See response to DR 3.1.

3.3. Identify each person or entity that received correspondence, documents or other materials directing such recipient to preserve correspondence, documents or other materials relating to the Winter Storm Event or this Action, including the date and time on which each recipient received said correspondence, documents, or other materials.

**RESPONSE:** The litigation hold was sent to the following persons on April 22, 2021:

Baine, Bobby D
Dixon, Victoria A
Godat, George E
Grewach, Alexander J
McKee, Robert W
Powers, Justin C
Yauch, Carol L

On November 23, 2021, the following employees were added to the hold:

Hayes, Gregory E
Linderer, Brenda S
Payne, Theresa
Reardon, Patricia C
Schormann, Michael J

3.4. State whether, to Spire’s knowledge, each recipient of a directive to preserve correspondence, documents or other materials relating to the Winter Storm Event or this Action has complied with that directive. If any recipient did not comply with said directive, and if any recipient did not so comply, identify said recipient and describe in detail the actions or inactions that violated said directive.

**RESPONSE:** Yes, to Spire Missouri’s knowledge.

3.5. Identify all correspondence, documents and other materials relating to the Winter Storm Event or this Action that were at any point in Spire’s possession, custody, or control, but are no longer so, and for each such correspondence, document and other material describe in detail the reasons why said correspondence, document and other material is no longer in Spire’s possession, custody, or control.

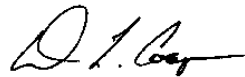
**RESPONSE:** None, to Spire Missouri’s knowledge.

3.6 If any correspondence, document or other material relating to the Winter Storm Event or this Action has been destroyed, describe same in detail and state when it was destroyed, identify the person who destroyed it, and state whether it was destroyed pursuant to any document retention or destruction policy.

**RESPONSE:** None, to Spire Missouri’s knowledge.

3.7. Describe in detail Spire's document retention policy/policies in effect at all times relevant to this Action and produce all said policies.

**RESPONSE:** See the attached documents.



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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 24<sup>th</sup> day of January, 2022, to:

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

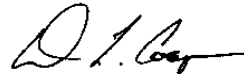
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**Subject:** IMPORTANT - IMPORTANT - PLEASE READ - LEGAL HOLD  
NOTICE FOR MATTER - 2021 OFO Penalty Litigation (February  
2021 polar vortex weather event)

**Message Body:**

PRIVILEGED AND CONFIDENTIAL  
ATTORNEY-CLIENT COMMUNICATION  
DO NOT DISCLOSE OR FORWARD

Re: Spire Legal Hold Notice

Sent: 04/22/2021 11:59 AM

Subject: 2021 OFO Penalty Litigation (February 2021 polar  
vortex weather event)

Spire, its affiliates and subsidiaries, is legally obligated to preserve all records and materials, including electronically stored information ("ESI") that may be relevant to the actual or potential legal matter listed above. As a custodian of these records, you are also subject to this legal responsibility to preserve all data and information. As such, please carefully review the contents of this message and click on the acknowledgment link below.

Please note you are required to adhere to the mandatory document retention policy outlined herein. Failure to adhere to this notice and/or preserve the requested information could result in Spire being confronted with severe sanctions and penalties.

Accordingly, until we notify you that the Legal Hold has been released, you need to preserve and hold in a safe place the following information or documents that relate to 2021 OFO Penalty Litigation (February 2021 polar vortex weather event):

- email
- documents, spreadsheets
- computer hard drives, DVDs, CDs, Memory sticks
- Server folders
- laptops
- cell phones
- text messages
- file drawers
- paper
- personal files at home
- computer media, devices, and locations

It is of critical importance that you comply with these procedures. Employees must take every reasonable step to preserve this information.

PLEASE indicate your acknowledgment and understanding of this Legal Hold notice as soon as possible by clicking on the link below:

**[Click here to Acknowledge](#)**

If you have any questions or concerns regarding these instructions, please contact Marcia Polster at [Marcia.Polster@spireenergy.com](mailto:Marcia.Polster@spireenergy.com) (314) 342-3361.

Thank you for your cooperation!

Legal Hold Name: February 2021 polar vortex weather event  
Legal Hold ID: 75



# Records and Information Management Policy

<b>Document number</b>	5002
<b>Policy applicability</b>	Spire Inc. and its subsidiaries
<b>Document owner</b>	Records Manager
<b>Reissue date</b>	7/11/2019

## 1. Policy statement

### 1.1. Statement

- 1.1.1. It is the policy of Spire Inc. and its subsidiaries (collectively, the “Company”) to use and maintain Records in accordance with all applicable federal and state laws, regulations and operating requirements. The Spire Records and Information Management Policy (“Policy”) has been established to help ensure that the Company retains Records to meet appropriate legal obligations, operational requirements, and routinely disposes of unnecessary Records in the normal course of business under the approved and current *Records Retention Schedule* (“RRS”) and in compliance with associated procedures, standards, and guidelines which are collectively the Records and Information Management Program (“Program”).
- 1.1.2. The Company is committed to enforcing this Policy as well as developing and maintaining procedures and RRS that address various categories of Records and enforcing compliance with such procedures and schedules.

### 1.2. Scope

- 1.2.1. This Policy applies to all Records, regardless of media or format, including paper and electronic Records. All employees, contractors, vendors and others who perform business activity for the Company must comply with all aspects of this Policy and are responsible for the safekeeping of Records in their custody or control.

### 1.3. Records Ownership

- 1.3.1. All Records created or received on behalf of the Company are the Company’s property and do not belong to employees, contractors, vendors and others who perform business activity for the Company.
- 1.3.2. Employees who have Company Records in their custody must return those Records to the Company upon request or when leaving employment. Third parties must also return Records to the Company upon request or termination of service.

### 1.4. Records Retention Schedule (RRS)



- 1.4.1. The RRS is the Company standard for retention and disposition of all Company Records.
- 1.4.2. New or enhanced business activities shall be evaluated to ensure that the Records associated with those activities are included in the RRS.
- 1.4.3. Individuals subject to this Policy shall notify the Records Manager of additional record types that need to be evaluated for inclusion in the RRS.
- 1.5. **Retention and Disposition**
- 1.5.1. Records shall be retained and disposed of in a systematic manner, in accordance with the Company's approved RRS.
- 1.5.2. Records covered by Legal Hold must be retained until the Legal Hold is released, regardless of the RRS.
- 1.5.3. Records related to Agreements that require the Company to return or destroy information pursuant to the executed agreement will be destroyed or returned in accordance with the agreement, regardless of the RRS.
- 1.5.4. All other exceptions to the RRS must be approved in writing by the Records Manager.
- 1.5.5. Once a record has been finalized, drafts and working copies shall not be retained, unless required by a Legal Hold.
- 1.6. **Protection and Access**
- 1.6.1. All Records will be maintained in an organized manner (labeled, indexed and categorized as necessary) to ensure that they can be located and / or used when needed or disposed of appropriately.
- 1.6.2. Records must remain readable, retrievable and accessible throughout the applicable Retention Period.
- 1.6.3. Records shall be protected in safe and secure conditions commensurate with the type of information and as required in the Information Security Policy and RIM Records Safeguarding Procedure.
- 1.6.4. In accordance to the RIM Records Safeguarding procedure, Records vital to the Company's business and operations are to be accorded enhanced protection and Records with historical value are to be properly preserved.
- 1.7. **Training**
- 1.7.1. Employees shall receive Records and Information Management (RIM) training as appropriate to their job duties and such training shall be documented.
- 1.8. **Legal Hold**
- 1.8.1. In case of anticipated or active litigation, legal actions, audits or investigations, individuals covered by this Policy will comply with the Legal Hold Policy and related procedures.
- 1.9. **Compliance**
- 1.9.1. The RIM Program shall be monitored for compliance on a regular basis by the Records Manager, Internal Audit and/or Compliance areas.
- 2. **Key accountabilities**
- 2.1. **VP & Chief Human Resources Officer:** Shall oversee the Records and Information Management (RIM) Program.
- 2.2. **Advisory teams and steering committees, including working teams, as necessary:** Will be established to provide tactical support for the Program.

- 2.3. **The Records Manager:** Shall be responsible for the development, implementation and management of the RIM Program, including but not limited to the maintenance of the RRS, development of RIM standards and procedures, training, compliance audits, approval of Policy exceptions associated with destruction, and administration of RIM systems.
- 2.4. **The Legal Department:** Is responsible for issuing a Legal Hold to suspend Records from destruction and shall have decision-making authority for the preservation and safekeeping of Records that are subject to a Legal Hold in accordance with the Legal Hold Policy.
- 2.5. **Department Leaders:** Shall be responsible for implementing, coordinating and facilitating RIM Program activities, standards and procedures and ensuring RIM responsibilities are performed by qualified individuals. The Department Leaders shall demonstrate an ongoing commitment within their department to the adherence of the RIM Program.
- 2.6. **Records Coordinators:** Maintain department Records according to Records Policies and Procedures. Serve as the liaison between their department and the Records program, ensuring department employees understand and follow the RIM Policy, and lead their team through RIM events such as the annual review of Records. Records Coordinators also review the Records Retention Schedule (RRS) and identify potential edits or additional Record Classifications.
- 2.7. **All employees, contractors, vendors and others who perform any business activity for the Company:** Shall fully comply with this Policy and communicate its requirements to parties who maintain Records on behalf of the Company. Failure to comply with this Policy may result in severe consequences for the Company, including monetary fines and penalties. It could also result in disciplinary action for employees of the Company, up to and including termination, for those who do not comply. Any individual subject to this Policy who becomes aware of a violation of this Policy shall promptly report the violation to the Records Manager or the General Counsel.

### 3. Defined terms

- 3.1. See RIM Glossary of Terms and Definitions.

### 4. Reference documents

- 4.1. **Document Number 5002-1:** RIM Records Safeguarding Procedure
- 4.2. **Document Number 5002-3:** RIM Transfer/Separation Procedure
- 4.3. **Document Number 5002-7:** RIM Records Disposition Procedure
- 4.4. **Document Number 4001:** Legal Hold Policy
- 4.5. **Document Number 3400:** Information Security Policy

### 5. Attachments

- 5.1. **Document Number 5002.1:** RIM Glossary of Terms and Definitions

## Document Review and Approval

### Document review list

Name	Position title	Date reviewed	Major revisions
Robert McKee*	Records Manager	12/17/2020	New procedure.
Ellen Theroff	VP, Chief Governance Officer & Corp Secretary	1/24/2014	New procedure.
Susie Kopp	Director, Real Estate, Facilities & Fleet	03/31/2017	None.

\*Indicates Document Owner

### Approve as to form

Name	Position title	Date approved	Initials
Ellen Theroff	VP, Chief Governance Officer & Corp Secretary	1/24/2014	ELT
Robert McKee	Records Manager	12/17/2020	RWM

### Leadership Council approval

Date	Comments
03/13/2014	

### Document history

Former document number	Comments
	Converted on 6/13/2016 to new format for name change. No LC approval needed for reformatting of the document.
	Update to bullet 1.5 was previously discussed by Leadership Council. 2/1/2017
	Updated oversight responsibility from CIP to VP, HR because of organizational change. 7/11/2019
	Updated bullet numbering and titles during regular review. 12/17/2020



## RIM Glossary of Terms and Definitions

<b>Document number</b>	5002.1
<b>Policy applicability</b>	Spire Inc. and its subsidiaries
<b>Document owner</b>	Records Manager
<b>Reissue date</b>	06/13/2016

### Defined Terms

**Confidential Records:** are those Records that:

- Provide a competitive, transactional, regulatory or other advantage to the Company or the disclosure of which is restricted by applicable federal, state or local law, rule, regulation or ordinance. It includes, without limitation, business plans, software, technology, computer programs, specifications, manuals, marketing plans, procedures and techniques, all data related to customers, pricing and policies of all kinds, financial data, ideas, concepts, research, development processes, operating procedures, “know-how,” and other similar data.
- Contain employee or customer private or personally identifiable information (i.e., information that can be associated with a particular individual through one or more identifiers, circumstances or other information)
- Are subject to legal prohibitions of disclosure or non-disclosure agreements or similar contractual restrictions concerning dissemination

**Department Leader:** Refers to the vice president, director, manager and/or supervisor within a department.

**Electronically Stored Information (ESI):** Computer data or electronic Recorded media of any kind that is stored in a digital medium from which it can be retrieved and examined.

**Employee:** Includes both full-time and part-time employees, as well as contingent workers, temporary hires, interns, consultants, and any other individual conducting work on behalf of Spire.

**Enterprise Content Management (ECM):** The strategies, methods and tools used to capture, manage, store, preserve, and deliver content related to organizational processes (AIIM).

**Historical Records:** Records of historical significance that document the founding, growth, development, organization, management and achievements of the Company.

#### Imaging Project Terms:

- **Batch** – A collection of one or more documents that will be scanned together as a unit and saved as a single file.

- **Business Sponsor** – Departmental leadership who ensures the imaging project is in line with departmental strategy.
- **Department Coordinator** – The primary Business Unit contact assigned and responsible for imaging project decisions. The Departmental Coordinator is knowledgeable about the material, how it is used and any/all associated, processes and works closely with the imaging vendor and the RIM team to ensure the success of the project.
- **De-Prep** – The process of reassembling documents after they have been imaged. For instance, stapling or clipping pages back together.
- **Document** – One or more sheets of paper or frames of microfilm that contains information belonging together. For example, a multi-page letter is considered one document.
- **Document Preparation** - Includes pre-scanning document handling which may include tracking, organizing, sorting documents, removing staples, clips, and bindings, mounting of oversized or undersized documents, preparing embossed notary seals, repair of damaged / ripped pages and re-assembly of the documents after conversion.
- **Employee** - Includes both full-time and part-time employees, as well as contingent workers, temporary hires, interns, consultants, and any other individual conducting work on behalf of Spire and its subsidiaries.
- **File** – An entity of data available to computer system users (including the system itself and its application programs) that is capable of being manipulated as a single unit (for example, moved from one file directory to another).
- **Image** – The electronic digital representation produced as a result of the scanning of an original document, or a representation of that data on a computer screen or on a hardcopy printout. A single image represents one page of a document.
- **Indexing** – Associating meaningful data to the imaged document. This could include inventory structuring, file naming, and the capture of necessary metadata fields as defined by Spire Inc. in the Statement of Work.
- **Output** - Scanned images provided by the vendor.
- **Project Documents:**
  - Statement of Work – A formal agreement document that specifies all the criteria of a contract between a service provider (vendor) and the customer. It clearly documents the project requirements, milestones, deliverables, end products, documents and reports that are expected to be provided by the vendor.
  - Change Order – A document created by the imaging vendor detailing changes to the Statement of Work (SOW) after the SOW has been approved and the project is in progress. Change Orders require approval by the Records Manager and business, and may require approval of additional funding for the project.
  - Project Clarification – A document created by the imaging vendor to clarify details for the SOW which do not change the Statement of Work. Project Clarifications require approval by the Records Manager and business, but do not require additional funding for the project.
  - Project Quality Document – A document created by the imaging vendor that details the delivered scanned images and any accompanying indexing files. This document is used to ensure the images and files meet the business needs and requires approval from the Records Manager and business.
  - Receipt of Electronic Images Files – A document created by the imaging vendor for review and approval by the RIM team. The document details the images and electronic

- files received and serves as an acknowledgement of receipt. This document is not an acceptance of project completion.
- Project Acceptance Document – A document created by the imaging vendor for review and approval by the Records Manager and business. The Project Acceptance Document details the final delivered images and files; it is the final sign-off on the project and, once signed, closes the project. The Project Acceptance Document should reflect that expectations detailed in the SOW and any Change Orders were met.
  - **Scanner** – A device that electronically captures data from a document in a raster pattern, and that creates a digital file of the image of that document.
  - **Scanning** – The process of electronically capturing an image of a document and storing it as a digital file.

**Legal Hold:** Preserves documents (physical and ESI), including Records, and suspends the enforcement of the Records Retention Policy for those documents and Records covered by the Legal Hold. A Legal Hold is often placed when events such as litigation, audits, or investigations occur. Upon receipt of a Legal Hold Notice, employees must take every effort to preserve the retention of all relevant Records.

**Legal Hold Notice:** Written notification, and any changes or amendments thereto, that litigation has been filed or is reasonably anticipated or foreseeable, that requires the recipients to preserve Potential Evidence in their possession or control.

**Non-Records:** Any documents, physical and electronic, that have no business, financial, legal, regulatory, or policy reason for retention for any particular period of time.

**Potential Evidence:** Any Record or Non-record that may reasonably be expected to be requested in discovery, used in, or related to litigation to which Laclede is or may reasonably anticipated or foreseen to become a party.

**Record:** Any type of information, data, or material in physical or ESI, created or received and maintained by or on behalf of Spire Inc. in connection of business or the conduct of its affairs and kept as evidence of such activity.

**Records Coordinator:** A designated employee who maintains their department's Records according to Records Policies and Procedures under the guidance of the Records Manager.

**Records and Information Management (RIM):** The field of management responsible for the systematic control of the creation, receipt, maintenance use and disposition of Records and information.

**RIM Program:** Collectively, the RIM Policy, the RIM Records Retention Schedule, associated RIM procedures, standards and guidelines.

**Record Keeper:** The department that is responsible for the Record and must ensure the Record is retained for the full retention period defined in the Record Retention Schedule.

**Record Retention Schedule:** A listing of Records, organized by Record Types, that is used to summarize and document retention periods and that governs the period of time that a Record must be kept before it is destroyed.

**Records Review:** Ongoing process to review Records in office cabinets, drawers, common storage areas, and other locations where hardcopy Records are maintained to determine if they are Records.

**Retention Period:** The period of time for which Records must be kept according to business, legal and/or regulatory requirements.

**Secure Shredding:** Protected receptacles marked for shredding.

**Spoilation:** The destruction, or the significant and meaningful alteration of Potential Evidence.

**Vital Records:** Records that are so critical to the Company that its ability to continue operations would be severely hampered without them. Vital Records are those required to:

- Continue operations or resume operations after a disaster
- Establish the Company's legal identity and / or rights
- Protect the Company from large financial loss resulting from legal action, fines or the inability to collect monies due
- Prevent shutdown resulting from the inability to document compliance with regulatory or legal requirements



# RIM Records Safeguarding Procedure

<b>Document number</b>	5002-1
<b>Policy applicability</b>	Spire Inc. and its subsidiaries
<b>Document owner</b>	Records Manager
<b>Reissue date</b>	06/13/2016

## 1. Purpose

### 1.1. The objectives are to:

- 1.1.1. Identify Records that need protection - Vital and Confidential Records.
- 1.1.2. Identify appropriate means to protect Records.
- 1.1.3. Ensure all Records needing protection are appropriately protected.

### 1.2. Scope

- 1.2.1. This Procedure applies to all hardcopy Records at all locations. All employees, contractors, vendors and others who perform business activity for the Company are responsible for storing Records in safe and secure locations and to protect them from harm, including:
  - (a) Ordinary hazards, such as fire, water, mildew, rodents, insects, and electrical, magnetic and atmospheric influences
  - (b) Man-made hazards, such as theft, accidental loss, sabotage, and commercial espionage
  - (c) Disasters, such as fire, flood, tornado, earthquake, wind, and explosion
  - (d) Unauthorized use, disclosure, alteration, and destruction

## 2. Defined terms

- 2.1. See RIM Glossary of Terms and Definitions

## 3. Procedure

- 3.1. In addition to safeguarding and general protection of Records, Records identified as Vital and Confidential warrant additional protection considerations.
- 3.2. **Vital Records**
  - 3.2.1. Identify Records that are Vital on the Records Retention Schedule (RRS).
  - 3.2.2. Vital Records must be protected at the earliest reasonable point in their lifecycle with one of the following methods with guidance from the Records Manager:
    - (a) Method 1 - Duplicate Records Stored Offsite: A paper, microfilm or electronic copy of the Records is created and stored at an approved off-site Records storage facility.



- (b) Method 2 - Records Stored Onsite in Fire Resistant Equipment: The Records are stored in fire resistant equipment (i.e., vaults, safes, or cabinets) located on the premise. Use only equipment that is rated for the type of media that it will house.
- (c) Method 3 - Business Dispersal Records Stored Offsite: As part of the normal business process, two or more complete copies of the Vital Records are stored in separate locations. An electronic version stored in a secured repository is acceptable, permitting the document remains retrievable throughout its retention requirement.

### 3.3. Confidential Records

#### 3.3.1. On-Site Storage and Access

To ensure Confidential Records are adequately protected onsite, maintain Confidential Records as follows:

- (a) Secure and control access and distribution
- (b) Lock up hardcopy Confidential Records in file cabinets or file areas with controlled access
- (c) Work with the Department Head or ITS to determine the use of any necessary additional methods of protection
- (d) Treat second copies and/or back-up copies of Confidential Records as securely as the originals

#### 3.3.2. Off-Site Storage and Access

For Confidential Records that will be stored by a third party, ensure that contractual terms between Spire and the third party adequately protect the Company against disclosure.

## 4. Roles and responsibilities

4.1. **Employees / Contractors/Vendors:** All employees, contractors or vendors who perform business activities and create and use Company records are responsible for the following:

- 4.1.1. Ensure Vital Records and Confidential Records are identified and catalogued.
- 4.1.2. Ensure Vital Records and Confidential Records are secured and protected as described in section 3.
- 4.1.3. Ensure that records are not destroyed before they have reached the specified retention period or if they are subject to Legal Hold.
- 4.1.4. Ensure that the appropriate method of destruction is used when records are eligible for destruction

4.2. **Records Manager:** The Records Manager is responsible for the following:

- 4.2.1. Work with Department Leaders to ensure Vital Records and Confidential Records are identified and catalogued.
- 4.2.2. Work with Department Leaders to ensure Vital Records and Confidential Records are secured and protected as described in section 3.
- 4.2.3. Coordinate appropriate receptacles for destruction of records in the normal course of business.
- 4.2.4. Coordinate and schedule destruction of records in off-site storage facilities.
- 4.2.5. Ensure the appropriate documentation for third party vendors is obtained.

## 5. Reference documents

- 5.1. **Document Number 5002:** RIM Policy
- 5.2. **Document Number 5002-2:** RIM Records Disposition Procedure
- 5.3. **Document Number 5002-4.1:** Records Retention Schedule (see Records Manager)
- 5.4. **Document Number 3400:** Information Security Policy

## 6. Attachments

- 6.1. **Document Number 5002.1:** Records Retention Schedule RIM Glossary of Terms and Definitions

## Document Review and Approval

### Document review list

Name	Position title	Date reviewed	Major revisions
Robert McKee*	Records Manager	06/13/2016	Converted to new format in June 2016 for name change.
Ellen Theroff	VP, Chief Governance Officer & Corp Secretary	2/6/2014	New procedure.
Susie Kopp	Director, Real Estate, Facilities & Fleet	03/31/2017	None.

\*Indicates Document Owner

### Approve as to form

Name	Position title	Date approved	Initials
Ellen Theroff	VP, Chief Governance Officer & Corp Secretary	1/24/2014	ELT

### Leadership Council approval

Date	Comments
3/3/2014	Original LC approval.

### Document history

Former document number	NA
Comments	Converted on 6/13/2016 to new format for name change. No LC approval needed for reformatting of the document.
	Reviewed 04/13/2021 and made formatting updates.



## Information Technology Acceptable Use Policy

Document number	3403
Policy applicability	Spire Inc. and its subsidiaries
Document owner	Director of Information Security and Compliance
Reissue date	09/24/2018

### 1. Policy statement

- 1.1. All employees of Spire Inc. and its subsidiaries (herein known as “Spire”) who utilize Spire computer resources must treat and manage them as a valuable corporate asset. Spire provides some, if not all, employees with electronic access. This policy governs all use of the network, internet/intranet access and email systems.
- 1.2. Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing electronic mail, web browsing, and FTP, are the property of Spire. These systems are to be used for business purposes in serving the interests of Spire, and of our customers.

### 2. Policy

#### 2.1. General Use and Ownership

- 2.1.1. Spire’s proprietary information stored on electronic and computing devices, whether the device is owned or leased by Spire, the employee or a third party, remains the sole property of Spire. You may access, use or share Spire’s proprietary information only to the extent it is authorized and necessary to fulfill your assigned job duties.
- 2.1.2. Under no circumstances is an employee of Spire authorized to engage in any activity that is illegal under applicable local, state, federal or international law, rules, or regulations while utilizing Spire-owned resources.
- 2.1.3. Distributing, posting or forwarding any profane, obscene, harassing or material that may be considered offensive is prohibited. Offensive material includes, but is not limited to, content that may offend any other person on the basis of race, color, gender, national origin, religion, marital status, sexual orientation, sexual subject matter, disability, or political beliefs.
- 2.1.4. Occasional, brief personal use of Spire’s assets that does not interfere with the performance of the employee’s job or the performance of Spire’s assets is allowed. Examples of prohibited uses include, but are not limited to, conducting online merchandising, playing games, gambling, engaging in sports-related activities or participating in other similar types of nonbusiness-related activity.

## 2.2. Privacy Expectations and Monitoring

### 2.2.1. Privacy Monitoring

- 2.2.1.1. Spire has authorized specific individuals or groups, including third-party contractors, to monitor equipment, devices, systems, network traffic, messaging and file content and to investigate alleged violations. Spire reserves the right to review and/or audit all information assets on a periodic basis without notice.

### 2.2.2. Privacy of Stored Personal Information/Electronic Communications

- 2.2.2.1. Spire may monitor or review information system usage and files, including content, without prior notice. Spire reserves the right to monitor, restrict use and dispose of email messages, other electronic communications and/or personal stored files. Employees should exercise caution when storing and processing personal and sensitive information not directly related to Spire business. Spire archives communications (e.g., emails) and information technology-related files (e.g., security logs, camera footage, etc.) per Spire's Records Retention Schedule (RRS) and Legal Hold Policy.

## 2.3. Internet and Social Media Usage

- 2.3.1. Spire expects all of its employees to act in accordance with the highest standards of personal and professional integrity at all times, to comply with all applicable laws, rules and regulations and Spire's Social Media Use for Employee Accounts Policy.

### 2.3.2. Unacceptable Internet Usage

- 2.3.2.1. Engaging in activities detrimental to the computer network or Spire resources, or that negatively affect job performance, is not permitted. Examples of unacceptable use include streaming or downloading music and video files, large file downloads, or other intensive tasks that may degrade network capacity or performance that have not been approved by management.
- 2.3.2.2. Using devices to perpetrate any form of fraud, such as downloading, copying or pirating software, film, music, or electronic files that are copyrighted or obtained without authorization.
- 2.3.2.3. Stealing, using, or disclosing someone else's password without authorization.
- 2.3.2.4. Using application and vulnerability testing tools without prior management approval.
- 2.3.2.5. Willfully/intentionally introducing malicious software on to the Spire network.
- 2.3.2.6. Sending any Spire files to personal email accounts.
- 2.3.2.7. Disclosing or posting Spire-related information that is financial, operational or legal in nature or any information related to personnel, clients, vendors, customers, shareholders or stakeholders.

### 2.3.3. Social Media Usage

- 2.3.3.1. Each employee is responsible for his/her own actions and social media activity.
- 2.3.3.2. Each employee is expected to be conscientious and use common sense when mixing his/her business and personal life online and should use electronic communications responsibly.
- 2.3.3.3. Employees are allowed to comment on matters involving Spire when posting but must be transparent, truthful and disclose their affiliation with Spire. When in doubt, employees should contact the Corporate Communications Department at 314-342-3300, or [Corporate\\_Communications@SpireEnergy.com](mailto:Corporate_Communications@SpireEnergy.com).

## 2.4. **Mobile Device Usage**

- 2.4.1. Mobile devices (including smartphones, Lync phones, cell phones, etc.) present a significant risk to information security.
- 2.4.2. Employees have a responsibility to promptly report the theft, loss or unauthorized disclosure of the Company's proprietary information or equipment.
- 2.4.3. Personal Mobile Devices
- 2.4.3.1. It is prohibited to physically connect a personal mobile device to company hardware or to the business network at any time without prior approval.
- 2.4.3.2. The unauthorized use of unknown mobile hotspot access points by employees within Spire's campus locations is prohibited.
- 2.4.4. Spire-Owned Mobile Devices
- 2.4.4.1. Reasonable use of Spire's assets for occasional, brief personal use that does not interfere with the performance of your job or the performance of Spire's assets is allowed. Examples of prohibited uses include, but are not limited to, conducting online merchandising, playing games, gambling, engaging in sports-related activities or participating in other similar types of nonbusiness-related activity.
- 2.4.4.2. All Spire-owned mobile devices must adhere to the following requirements:
  - 2.4.4.2.1. A password must be used to lock the device as allowed in the security settings of the device.
  - 2.4.4.2.2. Media files stored on devices must not be synchronized onto a Spire computing asset unless there is an approved business purpose.
  - 2.4.4.2.3. Capturing internal confidential or nonpublic information, such as digital images or pictures on a non-Spire issued mobile device, is prohibited.
  - 2.4.4.2.4. Use of mobile devices while driving/operating a motor vehicle is strictly prohibited. This includes texting and phone calls, unless using a hands-free Bluetooth device. Disable Bluetooth when not in use.
  - 2.4.4.2.5. Spire is not responsible for, and will not assist in the payment of, any fine or legal case involving the use of a Spire-owned mobile device in violation of this policy.

## 2.5. **Printer, Copier and Facsimile Usage**

- 2.5.1. Physically damaging or vandalizing printers, copiers and fax machines owned, operated, leased or contracted by Spire is strictly prohibited.
- 2.5.2. When confidential or nonpublic information is faxed, the information must be sent and collected immediately from the fax machine.
- 2.5.3. Unacceptable uses for copiers, printers and facsimiles owned, operated, leased or contracted by Spire include, but is not limited to:
  - 2.5.3.1. Unauthorized duplication of proprietary or confidential information regarding Spire business.
  - 2.5.3.2. Gambling or sports-related betting pools/squares/chain letters.
  - 2.5.3.3. Information that asserts or implies that personal views or opinions are that of the Company.
  - 2.5.3.4. Unauthorized copying of copyrighted material includes, but is not limited to, digitization and distribution of photographs from magazines, books or other copyrighted sources, is strictly prohibited.
- 2.5.4. Unacceptable uses for copiers, printers, and facsimiles not owned, operated, leased or contracted by Spire include, but is not limited to:

- 2.5.4.1. Unauthorized duplication of proprietary or confidential information regarding Spire business.
- 2.5.4.2. Information that asserts or implies that personal views or opinions are that of the Company.
- 2.6. **Software Usage**
- 2.6.1. Spire's Information Technology Services (ITS) Department is charged with the responsibility of enforcing the use of software. The following software usage requirements must be followed:
  - 2.6.1.1. Downloading and/or installation of software to Spire's computing or networking resources is prohibited without a valid business justification and ITS approval. This includes, but is not limited to, the following:
    - 2.6.1.1.1. Executable files
    - 2.6.1.1.2. Games
    - 2.6.1.1.3. Windows MSI files
    - 2.6.1.1.4. Proxies
    - 2.6.1.1.5. Audio files or players
    - 2.6.1.1.6. File sharing applications
    - 2.6.1.1.7. Video files
  - 2.6.1.2. Software purchased and provided by Spire for use by employees must be used for Spire business or education-related purposes only.
  - 2.6.1.3. Employees of Spire will abide by the terms of applicable licenses, notices, contracts and agreements as it pertains to the use of software on Spire networks, systems or data resources.
  - 2.6.1.4. Software acquired for, or developed by, employees and non-employees on behalf of Spire for associated business-related purposes shall be deemed Spire property.
  - 2.6.1.5. Software should not be reproduced or duplicated except as provided by the license agreement between Spire and the software manufacturer.
  - 2.6.1.6. Unauthorized software should not be installed, loaded or used on Spire's networks systems.
  - 2.6.1.7. Any use of copyrighted materials in violation of copyright laws or vendor licensing agreements is prohibited.
  - 2.6.1.8. Procurement of any software must be coordinated with ITS and Supply Chain.
- 2.7. **Password Management**
- 2.7.1. User level passwords must comply with the Password Policy. The following password requirements must be followed:
  - 2.7.1.1. Passwords should not be easily identifiable by either writing them down or sent electronically via email, text message, instant message or other electronic communication.
  - 2.7.1.2. In the event an account or password is compromised, or a compromise is suspected, immediately report the incident to the Director of Information Security and Compliance in accordance with the ITS Incident Reporting & Response Policy.
  - 2.7.1.3. It is best practice to decline use of the "remember password" feature on any application.

- 2.7.1.4. All passwords are to be treated as confidential information of Spire. Except as provided in the Password Policy, do not reveal your account password or allow use of your account by others. This includes family and other household members.
- 2.7.1.5. Accounts assigned to individuals for access to systems are considered identities. Individuals are held accountable and responsible for any use or misuse of the accounts assigned to them.
- 2.8. **Email and Instant Messaging Usage**
- 2.8.1. Employees must use extreme caution when opening email attachments received from unknown senders which may contain malware. The following email and instant messaging requirements must be followed:
  - 2.8.1.1. All employees are fully responsible for the content of every electronic message they send.
  - 2.8.1.2. Email and instant messaging applications are not a repository for official company records. All Spire records created while using these applications are subject to Spire's rules and policies for retaining and deleting business records as detailed in the Records Information Management Policy.
  - 2.8.1.3. Email and instant messaging should be used for business purposes and should be used when it is an appropriate and effective means of communication. Care is required to ensure that email messages are appropriately drafted and sent only to appropriate addressees.
  - 2.8.1.4. Employees must not send or forward email messages that pertain to Spire's business to unauthorized external email addresses (e.g., personal email accounts such as Yahoo, Gmail, Hotmail, etc.). If a user suspects that company data has been sent from a personal email account, either in body text or in an attachment, they must notify ITS immediately.
  - 2.8.1.5. Bypassing Spire's email system by utilizing alternative methods of electronic communications (e.g., AOL Instant Messaging, Yahoo, etc.) is strictly prohibited unless specifically authorized by your supervisor.
  - 2.8.1.6. Employees may not destroy, alter, hide or otherwise conceal email (including attachments) that are subject to an investigative demand, subpoena, audit, agency request for information, discovery in pending legal proceedings or other legal process, or may be material to threatened or imminent legal proceedings.
  - 2.8.1.7. Confidential, sensitive or restricted information should not be transmitted via email outside of Spire's network without appropriate safeguards (i.e. encryption) that have been approved as such by the Company's ITS Department. Employees must protect customer and employee privacy and business confidentiality pursuant to Spire's policies and procedures on privacy and confidentiality.
- 2.8.2. It is in violation of this policy to engage in any illegal or unethical activity, including but not limited to the following:
  - 2.8.2.1. Distribution of documents or information in violation of or restricted by federal or state laws or other applicable regulations.
  - 2.8.2.2. Constructing email communication such that they appear to be from another party with the intent to harass or to collect replies.
  - 2.8.2.3. Attempting to breach any security measures or to intercept any electronic messages without proper authorization.
  - 2.8.2.4. Distributing or forwarding any unlawful, deceptive, fraudulent, defamatory or disparaging content.



- 2.8.2.5. Distributing or forwarding any software attachments, copyrighted materials or other materials subject to license or other prohibitions against unauthorized distribution.
  - 2.8.2.6. Use of peer to peer file sharing software is strictly prohibited unless approved by the Director of Information Security and Compliance.
  - 2.8.2.7. Providing information about, or lists of, Spire employees to parties outside of Spire without a direct business purpose.
  - 2.8.2.8. Use of unsolicited email originating from within Spire's networks of other internet/intranet/extranet service providers on behalf of, or to advertise, any service hosted by Spire or connected via Spire's network is prohibited.
  - 2.8.2.9. The maximum retention period for all emails is 13 months. All emails will be automatically and permanently deleted after 13 months. Email and instant messaging applications are not a repository for official Spire records. All Spire records created while using these applications are subject to Spire's rules and policies for retaining and deleting business records as detailed in the Records Information Management Policy.
- 2.9. **Workstation and Laptop Usage**
- 2.9.1. Spire's ITS Department is designated as the manager of all workstations and laptops. Data created or otherwise used in support of Spire must be placed on systems that are appropriately protected and controlled. The following workstation usage requirements must be followed:
    - 2.9.1.1. Laptops must be powered on and connected to Spire's network for at least one full business day every 30 calendar days to receive vital security patches and updates.
    - 2.9.1.2. Spire's workstations/laptops shall be used for business-related purposes only.
    - 2.9.1.3. Employees are responsible for ensuring unattended equipment is appropriately protected. User shall be made aware of security requirements and procedures for protecting unattended equipment as well as their responsibilities for implementing such protection.
    - 2.9.1.4. Computers must be locked when employees leave their desk. (Press Ctrl/Alt/Delete, then click on "Lock this computer").
    - 2.9.1.5. Employees will not remove, disconnect, corrupt, circumvent, deny or otherwise interfere with any physical components, safeguards, authorized users' services, user identification and/or authentication schemes on workstations/laptops.
    - 2.9.1.6. Purposeful introduction of malicious software onto workstation/laptops (e.g., viruses, worms, Trojan horses, e-mail bombs, etc.) is strictly prohibited.
    - 2.9.1.7. Performing any form of network monitoring that will intercept electronic data is strictly prohibited unless this function is part of the employee's defined job duty.
    - 2.9.1.8. Computers are configured with an approved set of applications and configuration settings to adhere to company policies. Tampering with the operation, functionality or configuration of the following is prohibited:
      - 2.9.1.8.1. computer accounts and permissions;
      - 2.9.1.8.2. uninstalling, disabling or stopping services; and
      - 2.9.1.8.3. antivirus software, personal firewalls and desktop management software, etc.
    - 2.9.1.9. If a Spire-owned device is lost or stolen, contact your supervisor immediately and contact the service desk.

- 2.9.1.10. Laptops must be concealed and/or locked when in private transport (e.g., locked in the trunk of an automobile, safe of the hotel, etc.).

### 3. Policy compliance

- 3.1. The Director of Information Security and Compliance coordinates the development and maintenance of the information security and compliance policies.
- 3.2. Any exception to the policy must be approved by the Director of Information Security and Compliance in advance.

### 4. Defined terms

- 4.1. **Employee** – An employee of Spire includes both full-time and part-time employees, as well as contingent workers, temporary hires, interns, consultants, and any other individual conducting work on behalf of Spire.
- 4.2. **Extranet** – a private network that uses Internet technology and the public telecommunication system to securely share part of a business' information or operations with suppliers, vendors, partners, customers, or other businesses.
- 4.3. **Information Assets** – a piece of information, such as an employee record, a customer list, or a financial report, that is valuable to a company or organization.
- 4.4. **Newsgroup** – an electronic bulletin board on the Internet that is devoted to a particular topic.
- 4.5. **Usenet** – a collection of user-submitted notes or messages on various subjects that are posted to servers on a worldwide network. Each subject collection of posted notes is known as a newsgroup.

### 5. Reference documents

- 5.1. **Document #3400:** Information Security and Compliance Policy
- 5.2. **Document #3401:** Social Media Use for Corporate Accounts Policy
- 5.3. **Document #3402:** Password Policy
- 5.4. **Document #3405:** IT Security Event Reporting and Response Policy
- 5.5. **Document #3406:** Remote Access Policy
- 5.6. **Document #3407:** Mobile Phone Device Policy
- 5.7. **Document #3408:** Data Classification Security Policy
- 5.8. **Document #4001:** Legal Hold Policy
- 5.9. **Document #5002:** Records Information Management Policy
- 5.10. Social Media Use Policy for Employee Accounts

### 6. Attachments

- 6.1. **None**

7. **Acknowledgment**

By my signature below, I acknowledge that I have received, read and understand the Information Technology Acceptable Use Policy.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_

## Document Review and Approval

### Document review list

Name	Position title	Date reviewed	Major revisions
Chris Uhlemeyer	Systems Analyst III	09/21/2018	Changed wording for Spire equipment in Section 2.5.3. and added non-Spire equipment in Section 2.5.4.
Ryan Frillman*	Director, Information Security & Compliance	09/21/2018	Updated Policy compliance wording in Section 3.1.
Ryan Hyman	VP, Chief Information Officer	09/10/2018	

\*Indicates Document Owner

### Approve as to form

Name	Position title	Date approved	Initials
Ellen Theroff	Corporate Secretary, Associate General Counsel	09/21/2018	

### Leadership Council approval

Date	Comments
08/15/2016	

### Document history

Former document number	3403
Comments	Revised format to fit new Spire policy template - 07/15/2016
	Annual Review – 08/24/2017
	Annual Review – 09/24/2018

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
261	Accounts Payable	Accounts Payable (Non-Plant)	<p>Records related to the payment of financial obligations related to the purchase of all non-plant and related materials, as well as non-utility plant items. These records verify the purchase of goods and services and the accuracy of the invoice and authorization of payments. CNG stations, Propane Pipeline / Cavern, Oil Wells, Spire Marketing Software / Contracts, etc. Note: "Plant" equates to Capital or Fixed Asset purchases. "Utility" relates to state or federal regulated entities. Non-Utility refers to non-regulated entities such as Spire CNG, Spire Marketing, Spire Midstream, etc.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>ACH Final Payment Report for Review ACH Preview Register Accounts Payable Reconciliations Accounts Payables Customer Invoices and Statements EDI Payments Employee Expense Reports Form 120 General Office Invoice (for taxes and other non-P.O. issues) Invoices Payment Requisition Letters Vendor Invoices post 10/1/13) Vouchers (pre 10/1/13)</p>	7 Years	Supply Chain
80	Accounts Payable	Accounts Payable (Utility Plant)	<p>Records related to the payment of financial obligations related to the purchase of utility plant related materials. These records verify the purchase of goods and services and the accuracy of the invoice and authorization of payments for utility plant. These relate to Capital and Fixed Asset purchases for state or federal regulated entities: Mains, services, meters, regulators, tools, vehicles, equipment, buildings, IT related items (hardware, software, etc.).</p> <p>Confidential: No Contains PII: Historical: False Vital: True</p>	<p>ACH Payments Cancelled ACH Preview Register Accounts Payable Reconciliations Accounts Payables Customer Invoices and Statements EDI Payments Employee Expense Reports Form 120 General Office Invoice (for taxes and other non-P.O. issues) Invoices Payment Requisition Letters Vendor Invoices post 10/1/13) Vouchers (pre 10/1/13) Workflow approvals</p>	Disposition of Asset + 25 Years	Supply Chain
78	All Departments	Contractor Compliance Records	<p>Records documenting compliance with various governmental compliance requirements for contractors.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Contractor Safety Contractor Time Sheets Contractor drug testing compliance affidavits Diversity Information - Suppliers Insurance Information - Suppliers</p>	Termination of Contract + 6 Years	Human Resources Operations Training Safety, Environmental & Crisis Management Supply Chain

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
1	All Departments	Departmental Management and Administration	<p>Information documenting departmental administration, planning, and management activities.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Departmental Budget Material Departmental Meeting Records and Reports Departmental Work Schedules and Time Records (dept copies - official Time Records are kept under RRS #212) Employee Work Assignments and Work files Internal Memoranda and Correspondence Internal Presentations Route Sheets Weather Sheets</p>	No Longer Than 3 Years	All Departments
2	All Departments	External Affairs Compliance and Reporting- Rate Case, PSC Reporting	<p>Records related to the financial compliance and reporting of rate cases and PSC reporting. Includes filings and workpapers.</p> <p>Confidential: No Contains PII: Historical: False Vital: True</p>	<p>ACA Filing Workpapers Other PSC Workpapers PSC Report Workpapers Rate Case Workpapers</p>	15 Years	Various Departments
266	All Departments	Historical Artifacts	<p>Records of historical significance that document the founding, growth, development, organization, management and achievements of the Company.</p> <p>Confidential: No Contains PII: Historical: True Vital: False</p>	<p>Antique tools, pipe, or meters Retired signage Company publications Items with former company logos</p>	Permanent	Records and Information Management Corporate Communications

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
0	All Departments	Non-Records with Business Value	<p>Chronological Files Daily Calendars Departmental and Administrative Correspondence Project Status updates Monthly and Weekly Departmental reports Travel Itineraries and Ticket Copies Working Copies / department copies</p>	No Longer Than 3 Years	All Departments
		<p>Non-records may still have business value. These should be saved until they are no longer needed. These might include copies of Records retained by other departments. Non-Records do not require Authorized Destruction, but should be securely disposed of.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>			
17	All Departments	Policy and Procedures	<p>Corporate Policies and Procedures Departmental Policies and Procedures Governance Guidelines</p>	Current + 7 Years	All Departments
		<p>Records related to the development, maintenance and implementation of policies and procedures of the organization.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>			
150	Business Development	Billing and Bill Tracking Information	<p>Billing Issue Tracking Daily Read Files for Large Volume Transportation and Sales Service Customers Monthly Billing Statement Files for Large Volume Transportation and Sales Service Customers</p>	6 Years	Sales and Customer Accounts
		<p>Documents and records related to billing and reports to track billing for Large Volume Customers.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>			

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
151	Business Development	Customer Contracts	<p>Contracts entered into by Business Development for Large Volume, Commercial and Special Program billing and installation.</p> <p>Confidential: No Contains PII: Historical: False Vital: True</p>	<p>Contract for Large Volume Transportation and Sales Service Four Year Agreement Letters Installation (on appliances sold -last in 2009 Interruptible Gas Contract Large Volume Gas Contract Main Tap Gas Light Contract Rebate documentation Residential "B" Plan Agreements Sales Contract (on appliances sold -last in 2009</p>	Current + 6 Years	Business Development
222	Business Development	NGV Business Documents	<p>Documents related to business planning and budget.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Lambert Airport's RFP &amp; Company's response to said RFP NGV Initiative Budget NGV Initiative Business Plan</p>	Active + 3 Years	NGV Business Development
223	Business Development	Natural Gas Fueling Station	<p>Documents related to the continuing business relationship with Siemens and the natural gas vehicle/fueling station business.</p> <p>Confidential: No Contains PII: Historical: False Vital: True</p>	<p>*Anticipated* Gross Mechanical NGV Partnership Agreement *Anticipated* Letter of Intent (from potential customers that are stating that they intend to secure our services for the installation of a CNG fueling station) Design Build Contracts with Siemens or other Partner(s) Lambert Airport Lease Agreement (for property where fueling station is located) Maintenance Contractor Contract (contract with maintenance contractor to maintain NGV fueling stations) Non-Disclosure Agreement (to not disclose business details while pursuing fueling station) Siemens NGV Partnership Agreement Various Billing from Siemens for project construction</p>	Life of Venture + 10 Years	NGV Business Development



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
244	Claims	Documents related to damage claims	<p>Accident Estimates            Accident Reports            Collection files            Internal subrogation files            Company Auto, Truck and Equipment accident report            Open and Closed Contractor Damage claims            Open and Closed automobile damage claims            Open and Closed property/personal injury claims            Report of damage to company property            Settlement and expense checks</p>	Current + 6 Years	Claims
		<p>Records created and/or managed concerning claims related to property, personal injury, automobile and all other types of claims. This category includes subrogation, settlement and collection of claims owed to the Company. See RRS ID #287 for claims involving minors.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>			
288	Claims	Personal Injury Claims Involving Minors	<p>Open and Closed automobile damage claims involving minors            Open and Closed property/personal injury claims involving minors</p>	Later of Final Disposition or Age of Majority +6 Years	Claims
		<p>Records created and/or managed concerning personal injury claims involving minors. A personal injury claim arising from an auto accident, property damage or at a company construction site. Closed auto and property claims three years after settlement for claims of adults and three years after reaching age of majority for claims of minors. Note - States have varying ages of majority:            MO: 18            AL: 19            MS: 21</p> <p>Confidential: Yes            Contains PII: Yes            Historical: False            Vital: False</p>			
5	Communications	Charitable Giving	<p>Approved Grant Letters            Approved Requests &amp; Applications            Check Records (Charitable Giving)            Grant Applications            Grant Tracking Records</p>	5 Years	Corporate Communications
		<p>Records and information related to corporate sponsorships, corporate foundation grants, and charitable contributions made by the Company and/or its employees.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>			

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
6	Communications	Charitable Giving - Denials & Unapproved		1 Year	Corporate Secretary Corporate Communications
	Records and information related to denied or unapproved charitable contributions.  Confidential: No Contains PII: Historical: False Vital: False		Grant Denials Unapproved Grant Letters Unapproved Request & unapproved applications		
14	Communications	Communications - External		7 Years	Corporate Communications
	Communications directed at the public and shareholders.  Confidential: No Contains PII: Historical: True Vital: False		Advertisements (TV, print, radio, web) Annual Report Files and Print Copies External Communications Tools (websites, bill inserts, press releases/media alerts) Mandatory Advertisements (PSC safety ads) Media Reports/News Clip Social Media External User Guides		
15	Communications	Communications Research		3 Years	Corporate Communications
	Communications materials produced on behalf of internal customers, including surveys managed and received on behalf of internal customers.  Confidential: No Contains PII: Historical: False Vital: False		JD Power Results/Summaries RDA Survey Results/Summaries		
13	Communications	Creative Artwork, and Publications		7 Years	Corporate Communications
	Files containing artwork (letterhead, logos, etc.), communications, and publications created on behalf of the Company and Company Officers.  Confidential: No Contains PII: Historical: False Vital: False		Creative Services Files Photo Archives (print and digital) Video Archives Templates		

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
12	Communications	Employee Communications	Records related to general communications with employees. Includes website communications, newsletters, and leadership communications.  Confidential: No Contains PII: Historical: True Vital: False	Company-wide Employee Meetings Historical Publication Internal Communications Tools (Company TV, Intranet, inSpire, Internal Company News) Leadership Memoranda Various Signage (flyers, signs, clings)	3 Years	Corporate Communications
290	Communications	Marketing & Advertising	Requirements for records of advertising, including copies of advertisements by or for the company or on behalf of associate companies, cost documentation, and related records.  Confidential: No Contains PII: Historical: True Vital: False	Mandatory materials & ads Image-based ads Campaign-related promotions and ads.	Active + 7 Years	Corporate Communications
9	Corporate Secretary	Annual Reports & Annual Financial Statements	Requirements for SEC filings and annual financial, operating, and statistical reports to regulatory commissions and states.  Confidential: No Contains PII: Historical: False Vital: True	10-K Annual Reports	Permanent	Corporate Secretary
265	Corporate Secretary	Board and Shareholder Meeting Working Materials	Material provided or presented to the Board of Directors which is not relied upon for a specific Business decision.  Confidential: No Contains PII: Historical: False Vital: False	Briefing binders Working materials Presentations Administrative material	7 Years	Corporate Secretary

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
26	Corporate Secretary	Board and Shareholder Meetings	<p>Annual Meeting Documentation Board Committee Meeting Minutes Board Committee Meeting Notices Board Committee Voting Records Board Meeting Minutes Board Meeting Schedules Meeting Materials / Meeting Mailing Files Shareholder Meeting Minutes Shareholder Meeting Notices Shareholder Proxies Shareholder Voting Records Subsidiary Board Meetings</p>	Life of Corporation + 25 Years	Corporate Secretary
7	Corporate Secretary	Business Organization and Incorporation	<p>Articles of Incorporation Corporate Seal Corporate and Board Committee Charters Corporate and Subsidiary By-Laws</p>	Permanent	Corporate Secretary
10	Corporate Secretary	Insider Filings	<p>Form 3s Form 4s Form 5s</p>	Termination/Retirement + 6 years	Corporate Secretary
8	Corporate Secretary	Quarterly and Other Company SEC Filings	<p>10-Q8K Proxy Statements</p>	15 Years	Corporate Secretary

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
3	Corporate Secretary	Registered Shareholders and Corporate Stock	Cancelled Stock Certificates (maintained by TPA) Prospectus for Stock Plans Registration Statements Shareholder Lists Shareholder Records(maintained by TPA) Stock Ledgers (maintained by TPA) Stock Redemptions(maintained by TPA) Stock Transfers(maintained by TPA)	Completion + 7 Years	Corporate Secretary
		Records related to registered shareholders and the recorded transactions of corporate stock. Records are used to identify active shareholders and dividends paid to them.			
		Confidential: No Contains PII: Historical: False Vital: False			
4	Corporate Secretary	Shareholder Communications	Shareholder Correspondence Shareholder Publications	7 Years	Corporate Secretary
		Records related to general communication with shareholders. Excludes shareholder meeting notices, voting records or proxies.			
		Confidential: Yes Contains PII: No Historical: False Vital: False			
316	Customer Experience	ACH Authorizations		While active + 2 years	Customer Relations
		Records of consumer notices and consents for authorized electronic funds transfers			
		Confidential: No Contains PII: Historical: False Vital: False			
106	Customer Experience	Bad Debts and Collections	Bankruptcy Documentation Charge-Off Records Uncollectible Accounts Uncollectible Write-Off Documentation	10 Years	Credit & Collection
		Records related to the monitoring, collecting, and writing off of bad debts.			
		Confidential: No Contains PII: Historical: False Vital: False			

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
94	Customer Experience	Call Center Operations	<p>Records related to the management and administration of a call center.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>Call Center Daily Report Call Center Emergency Logs Call Center Performance Evaluations Call Center Performance Reports Call Logs Call and Agent Data Customer Interaction Logs Customer Surveys Employee Call Monitoring Evaluations Operational Data Phone Logs Phone System Data Productivity Reports</p>	3 Years	Customer Relations
111	Customer Experience	Community Service Agency Historical Records	<p>Historical records related to the administration of Dollar Help prior to United Way administration of the program.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>		Completion + 6 Years	Community & Agency Services
107	Customer Experience	Customer Account - Contracts	<p>Confidential: No Contains PII: Yes Historical: True Vital: False</p>	<p>Copies of Energywise and Insulation Contracts Elderly/Handicapped (credit application and approval/denial) Energywise - (credit application and approval/denial) Insulation - (credit application and approval/denial) Medical Emergency (credit application and approval/denial)</p>	Completion + 6 Years	Community and Agency Services

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
46	Customer Experience	Customer Account Information		6 Years	Business Support Services
	Records related to information on customer accounts.		Customer Bill Images Customer Calls and Recordings		
	Confidential: No Contains PII: Historical: False Vital: False				
105	Customer Experience	Customer Accounts - Billing / Collections Issues		6 Years	Credit & Collection
	Records related to a variety of billing and collection issues and anomalies including ID theft, Locked Meter Showing Usage, Data Raker analysis and Bankruptcies.		Data Raker Field Audits/Visits Field Orders Identity Theft Affidavits Inactive Non-AMR Field Orders Locked Meter Showing Consumption (LMSC) Route Sheets		
	Confidential: No Contains PII: Historical: False Vital: False				
99	Customer Experience	Customer Accounts - Logs, Reports and Billing		6 Years	Meter to Cash - Billing
	Records related to customer accounting and billing function.		1099 Form - Deposit Interest over \$600 Allowance Request Files Blue Rebills Check Register - Billing Deposit Slips - Billing Dummy Meter Change Adjustments Escheat Letters and Spreadsheets Over \$500 Invoices - Binder P.O. Returns (refund checks) Balance Log Re-Instated Account Rebill Request Refund Order - Form 453 Stop Pay Confirmation Unmetered Gas Calculations, Allowances and Reversals		
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
102	Customer Experience	Customer Accounts - Multi Index Accounts		6 Years	Meter to Cash - Billing
	Records related to large volume meters with more than one dial and/or reading device, both commercial and residential.		Demand Cards Mana Log Read Cards Senior Account Files Specials" Database Specials" Spreadsheet		
	Confidential: No Contains PII: Historical: False Vital: False				
98	Customer Experience	Customer Accounts Reports		1 Year	Meter to Cash - Billing
	Reports and records created in support of the Customer Accounting function.		Budget CNG Bill Calculation & "calc sheets" Company Consumption Company Consumption Cards Daily Bill Verification Interruptible Period Documentation Jobbing Daily Balancing Jobbing Monthly Balancing Meter Reading Exception Cases Tap Gas Reports		
	Confidential: No Contains PII: Historical: False Vital: False				
109	Customer Experience	Customer Complaints		6 Years	Community & Agency Services
	Customer complaints received and responses by the Company to complaints concerning matters related to Company's service to its customers.		Attorney General Inquiries/Complaints BBB Inquiries/Complaints CSD executive Inquiries/Complaints MPSC Inquiries/Complaints President Calls/President Letters Survey Cards (with negative comment addressed)		
	Confidential: No Contains PII: Historical: False Vital: False				
93	Customer Experience	Customer Correspondence		6 Years	Customer Relations
	Records related to correspondence with customers and customer contact through recorded telephone calls.		Customer Contact Customer Correspondence (letters and email) Monthly Activity Reports Recorded Customer Calls Turn On/Turn Off Postcards (Legacy)		
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
291	Customer Experience	Customer Deposits		Completion + 6 Years	Meter to Cash
	Requirements for records of customer deposits and refunds. Deposit Report, Non-Cash Deposits.		Past Due Receivables & Detail Report Deposits with Non-Pay DISC Summary & Detail Guarantors Agreements, Letters of Credit and Surety Bonds		
	Confidential: Yes Contains PII: No Historical: False Vital: True				
97	Customer Experience	Customer Diversion Records and Billing Reports		Current + 6 Years	Meter to Cash
	Records created in the course of an investigation and billing of customer diversion of gas. (Legacy only)		Billings Diversion "Paid In Full" File Diversion Calculation File Diversion Payment Coupons Information of Original Discovery of Diversion Record of Payments		
	Confidential: No Contains PII: Historical: False Vital: False				
110	Customer Experience	Customer Grant Reconciliation		Completion + 7 Years	Community & Agency Services
			CC&B Suspense Account Reconciliation		
	Confidential: No Contains PII: Historical: False Vital: False				
95	Customer Experience	Customer Issues		6 Years	Customer Relations
	Records related to customer interaction and or service need, including reports and memos on customer Issues.		Billing Exception CSS To Do CSS Case Disputed Jobbing Charge (case or To Do)		
	Confidential: No Contains PII: Yes Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
268	Customer Experience	Customer Payment Work Papers	Materials related to customer account adjustments and cash balancing.  Confidential: No Contains PII: Historical: False Vital: False	Payment Transfer Requests Adjustment detail (adjusts to customer accounts) Remittance Stubs (customer payment) detail Internal Department Daily Balancing Worksheets/petty cash balancing (eliminated 10/1/12)	1 Year	Meter to Cash
104	Customer Experience	Customer Payment, Non-Payment and Disconnection Orders	Orders and records related to collection of payment, non-payment, exceptions from payment, charge-offs and disconnection of service for various reasons.  Confidential: No Contains PII: Historical: False Vital: False	40 day data base Cash Vouchers Charge-Off Database Collection Department Faxes Collection Dept. (CD) Investigations Collection Dept. (CD) Investigations Disconnects/Completed Field Order Memo/Customer Relations Monthly Collection Agency Statements Payment Envelopes Payments/Completed Field Order Probate File Receipt Books Transfer of Balances; benefit of services Visited/Completed Field Orders	6 Years	Meter to Cash - Field Collection
96	Customer Experience	Customer Relations and Correspondence	Records related to customer communications used for reference, billing purposes, and other inquiries. Includes meeting minutes, general customer correspondence, supporting documentation, and customer reference information. Also includes service applicati  Confidential: Yes Contains PII: Yes Historical: False Vital: True	Automatic Payment Plan Applications Billing Investigations Canceled Landlord Leave On Files Completed Services Credit f Refund Requests Customer Account Changes Disconnect Letters Easy Pay Files / Auto Pay Insurance Errors	Termination of Customer Account + 6 Years	Customer Relations

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
90	Customer Experience	Customer Reminders and Tallies	<p>Reminder postcards to employees and the tally sheets kept daily by customer service representatives.</p> <p>Confidential: No Contains PII: False Historical: False Vital: False</p>	1 Month	Customer Relations
			<p>Atmospheric Corrosion Inspection Postcards Meter Change Postcards / Communications Service Representatives Tally Sheets</p>		
108	Customer Experience	Grant Administration	<p>Records and reports related to administration of LIHEAP grants for low income assistance, administered by the Division of Social Services for the State of Missouri.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	Grant Award + 7 Years	Community & Agency Services
			<p>Dollar Help Reconciliation Energy Assistance (LIHEAP) Files Heat Grant - reconciliation</p>		
112	Customer Experience	Meters - Meter Reading Reports	<p>Reports generated from the electronic meter reading system that provides data to the billing system and records of meter readings.</p> <p>Confidential: No Contains PII: False Historical: False Vital: False</p>	6 Years	Billing Meter Reading and Billing Department
			<p>AMR Installation with Meter Number Change Cellnet Index Change (Type X) Meter Changes Customer Self Reads Meter Read Metrics Data Raker Meter Reading Export Reports Meter Reading Import Reports Meter Readings Monthly Billing Meter Reads File to CC&amp;B Number of Meters Reports Zero Use Reports Data Raker</p>		

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
92	Customer Experience	Meters, Disconnects and other Transactions	Automated TFTO Service Order Errors To Do Disconnects to be Finalized To Do Meters Pending Transaction Report for Large Meters (include DR Investigates) (CA2062) Overdue Orders (CA0060) (in development) Transactions To Do	6 Years	Customer Relations
	Records related to meter changes, automated meter reading, customer disconnects and other customer transactions. Includes reconnects.				
	Confidential: No Contains PII: Historical: False Vital: False				
258	Customer Experience	Office Estimate Approvals	Office Estimate Approvals	7 Years	Meter to Cash - Billing
	Supervisor approvals for modified (estimated) reads by ARC				
	Confidential: No Contains PII: Historical: False Vital: False				
100	Customer Experience	Purchased Gas Adjustment	PGA Rate Change Documentation PGA Schedule Preparation Package Published PGA Schedules	Life of Rate + 6 Years	Business Analysis
	Records related to customer accounting and purchased gas adjustment.				
	Confidential: No Contains PII: Historical: False Vital: False				
267	Customer Experience	Reconciliation of Payments	Cashier's Daily Reports (cash reconciliation) MoNat Daily Reports (MoNat cash reconciliation) Payment Image CDs (images of checks and remittance bill stubs) Spreadsheet and cash coupons used to account for receipts outside of CC&B Vendor Invoices (only those not handled by Supply Chain) Redeemed Gift Certificates and associated payment batch detail and tracking log Heating Assistance Check copies	7 Years	Meter to Cash
	Materials utilized to account for and balance transactions handled through the Cashier's window.				
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
289	Customer Experience	Sales Tax Exemption Determinations - Customers	Exemption Determinations Tax Exemption Certificates (F149, F4438 and Non-Profit Exemption Certificates)	Current + 7 Years	Meter to Cash
	Records related to the qualification of any commercial electric service and gas customers eligible for sales tax exemptions.				
	Confidential: No Contains PII: Historical: False Vital: False				
91	Customer Experience	Short term attendance and overtime records	Declined Overtime Tracking Sheet OT Tracker	1 Year	Customer Relations
	Confidential: No Contains PII: Historical: False Vital: False				
101	Customer Experience	Tax Increment Financing and Community Improvement District	Community Improvement District Tax Increment Financing	Life of Tax District + 10 Years	Meter Reading and Billing Department
	Records related to administration of Tax Increment Financing and Community Improvement Districts with respect to customer billing.				
	Confidential: No Contains PII: Historical: False Vital: False				
283	Customer Experience	Third Party Vendor(s) Invoice(s)	Third Party Vendor(s) Invoice(s)	12 Months	Meter to Cash - Billing
	Credit and Collection Dept Third Party Vendor Invoices include Collection Agency(s) and Information Technology service providers. Monthly invoices for services rendered are provided which include detailed usage including Company customer identifying data. Examples include but are not limited to: name, service address, & social security number.				
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
241	External Affairs	Governmental Compliance And Reporting	Rate Case Workpapers Rate Schedule Change Reports Rating Agency Studies and Correspondence Responses to Data Requests	Indefinite	External Affairs
	Records created, managed and/or submitted to governmental and standards agencies to comply with local, state and federal requirements not covered elsewhere. Includes federal and state governmental compliance records and non-rate case PSC filings. Does not include asset management, employee accident/injury, hazardous exposure or medical records.				
	Confidential: Yes Contains PII: No Historical: False Vital: True				
242	External Affairs	Records Related to Hearing Transcripts and Admin. Orders related to an	APSC Public Forum (Hearings) Deposition Transcripts Filed Testimony before the State PSC Hearing Transcripts State PSC Orders Tariff Rate Change Documentation & Support	30 Years	External Affairs
	Copies of administrative hearing transcripts, deposition and/or filed testimony related to State PSC actions and State PSC orders				
	Confidential: Yes Contains PII: No Historical: False Vital: True				
238	External Affairs	School Aggregation records	School Aggregation Batch Electronic Bill School Aggregation Capacity Release School Aggregation Delivery Schedule School Aggregation Imbalance Calculation School Aggregation Monthly Billing Data	6 Years	Tariff and Rate Administration
	The State of Missouri allows a consortium of public schools to access bulk natural gas supplies through aggregate purchasing. These are the records produced and created with respect to the school purchases.				
	Confidential: No Contains PII: Historical: False Vital: False				
239	External Affairs	Tariff and Rate Setting	LVTSS PGA notice PGA tariff sheet- non-LVTSS Tariff sheets other than PGA Spire Pipeline Form 6 Page 700 Pipeline Tariff	Active + 6 Years	Tariff and Rate Administration
	Records and documents created and kept for purposes of tariff and rate setting and review at both the federal and state levels.				
	Confidential: Yes Contains PII: Yes Historical: False Vital: True				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
263	Facilities, Real Estate & Fleet	Defects-Transportation		3 Years	Fleet
	Documentation demonstrating that identified defects have been repaired, and the date of repair. Retained for DOT purposes.				
	Confidential: No Contains PII: Historical: False Vital: False				
23	Facilities, Real Estate & Fleet	Facilities Construction - Utility Plant		Life of Plant + 6 Years	Facilities
	Engineering drawings, designs, and project notes for the construction of utility plant buildings and general facilities.		As-Built Drawings Blueprints Construction Documentation (General) Facility Site Plans		
	Confidential: No Contains PII: Historical: False Vital: True				
21	Facilities, Real Estate & Fleet	Facilities Maintenance and Equipment History		Life of Facility + 6 Years	Facilities
	Records related to the general maintenance, repair and inspection of utility plan facilities, including leased facilities.		Building Inspections and Reports Commissioning Documentation Facility Metrics Furniture Purchase, installation and maintenance records. Leased Property Records (General) Maintenance Certificates Maintenance Logs Maintenance Records (General) Maintenance Schedules Maintenance WO Operation and Maintenance Manuals Property Appraisals		
	Confidential: No Contains PII: Historical: False Vital: True				
304	Facilities, Real Estate & Fleet	Vehicle Accident Logs		Completion +3 Years	Fleet
	Records of motor carrier accident registers and supporting documentation, and of hazardous materials incident reports.				
	Confidential: No Contains PII: Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
305	Facilities, Real Estate & Fleet	Vehicle Documentation	Documentation pertaining to the ownership of a vehicle, including title and the renewal of license plate tags. Includes Federal Annual Department of Transportation (DOT) periodic inspections (previously under their own record series).  Confidential: No Contains PII: Historical: False Vital: False	DOT Periodic Inspections License plate tag renewal Vehicle title	Superseded or Disposition of Vehicle	Fleet
251	Facilities, Real Estate & Fleet	Vehicle Inspection Report	Daily Vehicle Inspection Reports (VIRs) for vehicles owned or leased by the Company.  Confidential: No Contains PII: Historical: False Vital: False	Vehicle Inspection Report	3 Months	Fleet
84	Facilities, Real Estate & Fleet	Vehicle and Equipment Records	Leasing and Unit Files containing information on vehicle mileage/equipment usage, maintenance and repair.  Confidential: No Contains PII: Historical: False Vital: True	Fleet Focus Leasing Records and Payments Sales Unit Files Work Orders	Life of Asset + 6 Years	Fleet
86	Field Operations	Construction and Damage Records	Records related to the continued work needed on previously worked locations. Includes documentation of its completion, records of the paving work completed and damage to Company facilities for possible future action.  Confidential: No Contains PII: Historical: False Vital: False	Construction and Maintenance Department Work Report (Form 686) Damage to Company Facilities (by others) Monthly Drip Record Paving Records	6 Years	Construction and Maintenance



## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
155	Field Operations	Damages, accidents and safety	<p>Reports and documents kept with respect to damage to Company property, damage to other's property by Company, vehicle accident reports and safety audits on SAID van contents. These records are duplicates kept only for reference in the department. Report is completed &amp; sent to Claims. Copy of the report is retained in the employee files.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Damage reports (other's property by Company - Form F650) Report to Legal (damage to Company property - Form F632) Safety Audit of SAID vans Vehicle Accident Form (F418)</p>	1 Year	Service and Installation Department
158	Field Operations	Diversion Investigation	<p>Records related to investigation of suspected diversion of gas by customers and related billing issues.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Diversion cover sheets Diversion files</p>	Current + 6 Years	Service and Installation Department
157	Field Operations	Service Department - Field Ops	<p>Reports and documents kept with respect to customer service performed. In Alabama, Dispatch enters Work Orders into SAP.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>After-hour service requests (call-outs) Charge receipts Expedient Purchase Order and Parts Determination Order Hazard Tickets Hazardous Appliance Report (F627) Home Sale Inspection report Inside Leaks Outside Leaks Report of Code violation found Report of Hazard found Service Tickets / Work Orders / Jobbing</p>	6 Years	Service and Installation Department Dispatch

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
87	Field Operations	System Maintenance Records	Miscellaneous Corrosion Repair Order Pipe Line Marker Card	Life of Facility	Construction and Maintenance
	System records maintained for life of facility.				
	Confidential: No Contains PII: Historical: False Vital: True				
321	Finance	Abandoned Property or Escheatment		10 Years	
	Records of unclaimed property, including report filings and supporting information.				
	Confidential: No Contains PII: Historical: False Vital: False				
62	Finance	Accounting Analysis and Reports	Balance Sheet Reviews Budget Billing Factors Budget to Actual Analysis Daily Snapshot Delivery & Receipts Analysis Director's Weather Report EIA Annual Report PGA Estimate Paragraph C Price Volume Analysis Statistical Information Unbilled Calc Unbilled Estimates Use Per Customer Per Degree Day Variance Analysis Weather & Consumption Analysis	6 Years	Operational Accounting
	Accounting reports and analysis.				
	Confidential: Yes Contains PII: No Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
60	Finance	<b>Accounting Management Analysis and Reports (Non-Utility)</b>	<p>2365 Added and Deleted Budget Customers 5914 Rate 9 8100 A-F 8110 Non-Utility Revenue Balancing Report Accounts Payable Aging/Analysis/Distribution Reports Accounts Receivable Aging/Analysis/Distribution Reports Billing Histories CA 5918, 5918, 5919, 8065 A1, 1155B Cash Disbursement Schedule Reports Confirmation Reports (Regulated Companies) Contract Rate Changes Daily Revenue Disbursement Summaries Non-Plant Analysis Pension Fund Studies and Supporting Documentation Revenue Balancing Report Schedule 8-9 Depreciation Reserve Trended Reports</p>	No Longer Than 3 Years	Financial Reporting Operational Accounting
		<p>Reports related to the non-utility accounting function. Includes aging and distribution reports. Excludes invoices, sales orders, cash receipts, certain financial reporting/asset management/financial services analysis and reports. [Consider index reference</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>			
63	Finance	<b>Asset Management Compliance Reporting</b>	<p>Charge Job Workpapers ISRS Workpapers Plant Records Work Order Reports</p>	7 Years	Operational Accounting
		<p>Records created, managed and/or submitted to governmental and standards agencies (including FERC) to comply with local, state and federal requirements regarding asset management.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>			
64	Finance	<b>Asset Management Reports (Utility)</b>	<p>Capital Expenditure Report Inventory Reports (Utility Plant) Personal Property Tax Annual Workpapers Trended Reports USR Workpapers</p>	6 Years	Operational Accounting
		<p>Reports related to the asset management function of utilities. See (INDEX #) for Accounting Management Reports.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>			

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
56	Finance	Budget and Forecast	<p>Budget Analysis and Data Budget and Related Workpapers/Reports/Comparisons Budget to Actual Results Capital Budgets Financial Forecasts Financial Planning Records Forecast and Revisions Monthly Sales Results Operating Budgets Operating and Capital Forecasts Plant Budgets</p>	Active + 3 Years	Financial Planning & Analysis Operations Controller
		<p>Records related to budgetary planning, financial management, financial planning, and forecasting. Records of budgets and forecasts should therefore be retained for a prudent period after superseded or no longer active, such as three years.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>			
53	Finance	Financial Analysis - Utility	<p>Annual Work Order Detail for Open/Closed WO's at FYE Fixed Capital Report Gas Plant Held for Future Use Mains &amp; Services Reports Maps Meters Installed Service Order Report Input Batch Balance Register Services Installed &amp; Retired Utility Plant Asset Additions, Retirements &amp; Transfers Utility Plant Assets, Amortization, Depreciation</p>	Life of Asset + 25 Years	Operational Accounting Financial Reporting
		<p>Financial Analysis of utility activities and other capital expenditures.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>			
52	Finance	Financial Analysis - non-Utility	<p>Account Analysis Utility Plant Allocation Check, PP35, PP65 Balancing Reports Monthly Statistical Report Workpapers</p>	6 Years	Financial Reporting
		<p>Reports and documents providing useful utility financial information to management. Does NOT pertain to Fixed Assets.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>			

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
50	Finance	<b>Financial Compliance and Reporting</b>	<p>Records related to financial compliance and reporting to SEC Filings and Benefit Plans. Includes the filings and supporting workpapers.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>	<p>Analyst Package Annual Report Workpapers Benefit Plan Filings and Work Papers CA 6050 Revenue Usage Effective Tax Rate Analysis Estimated Income Tax Payment Workpapers Financial Page Maintenance, Support &amp; Verification Securities and Exchange Commission (SEC) Filings and Reports Supporting Documentation for SEC Filings and Reports Tax Accounting Records/Bills/Receipts/Statements</p>	<p><b>7 Years (Workpapers are 7 years after Completion of Audit)</b></p>	<p><b>External Financial Reporting Financial Reporting Tax</b></p>
51	Finance	<b>Financial Compliance and Reporting - Rate Case, PSC Reporting</b>	<p>Records related to the financial compliance and reporting of rate cases and PSC reporting. Includes filings and workpapers.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>	<p>ACA Filings and Workpapers Rate Case and Workpapers LNG Inventory</p>	<p><b>Indefinite</b></p>	<p><b>External Financial Reporting Financial Reporting</b></p>
61	Finance	<b>Financial Management Reporting</b>	<p>Reports and documents providing useful financial information to management. These records are not part of accounting transaction processing or financial statement functions. Includes cost audit reports, key indicators, and status reports.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>EPS Monthly Data Monthly Reports Performance Summary Reports Quarterly Statistics Reports Status Reports</p>	<p><b>6 Years</b></p>	<p><b>Financial Planning Operations Controller</b></p>

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
279	Finance	Financial Reporting - External	<p>Financial statements, reports, and background information submitted to government agencies, shareholders, and others. Includes annual reports and financial statements from subsidiaries and divisions. Excludes government or regulatory filings such as Securities and Exchange Commission (SEC) filings.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>Cash Flow Statement Closing Reports Consolidated Balance Sheet and Income Statement EIA Survey Financial Statements Subsidiary Financial Statements Supplemental Schedules</p>	<p>Completion + 7 Years</p> <p>External Financial Reporting Financial Reporting Operational Accounting</p>
308	Finance	General Ledger Account Reconciliation	<p>Supporting documentation to verify the integrity of account balances on the company's general ledger of accounts. Includes the research and investigation, along with the corrective action, retained for audit purposes. If changes are made due to reconciliations, reference RRS #55 Ledgers and Trial Balances.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Balance sheet account reconciliations Reconciliations between subsystems or to general ledger Revenue reconciliations</p>	<p>7 Years</p> <p>Financial Reporting</p>
48	Finance	Governmental Compliance and Reporting	<p>Records created, managed and/or submitted to governmental and standards agencies (including FERC) to comply with local, state and federal requirements not covered elsewhere. Includes federal and state governmental compliance records and non-rate case PSC</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>Acquisition Disclosures Annual Customer Service Reports Annual Department of Transportation Reports Benefit Plan Government Reporting, Form 5500 Capital Structure Filings Credit Reviews/Letters Director and Officer Questionnaires Dividend Policy Review EIA &amp; EPR Survey FAS 106 Reports Rating Agency Studies and Correspondence Responses to Data Requests Surveys &amp; Supporting Documentation</p>	<p>7 Years</p> <p>External Financial Reporting</p>

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
260	Finance	Journal Entries - Non-Utility Plant	<p>Accounts Payable/Receivable Journal Entries            Accruals/Adjustments            Cash Receipts/Disbursements            Journal Vouchers, Registers, Batches            LER Accounting Records, Packets and Options            Margin Account Journal Entries            Marketing Packets and Options            Subsidiary Accounting Records</p>	7 Years	Financial Reporting Operational Accounting
		<p>Journal entries and records related to the transfer of charges between accounts and summaries of account information for non-regulated (non-utility) business entities that do not involve Capital/Fixed Asset items..</p> <p>Confidential: Yes            Contains PII: No            Historical: False            Vital: True</p>			
54	Finance	Journal Entries - Utility	<p>Entries relate to mains, services, meters, regulators, tools, vehicles, equipment, buildings, IT related equipment etc. such as:            Accounts Payable/Receivable Journal Entries            Accruals/Adjustments            Cash Receipts/Disbursements            Cost Allocation Manual (CAM)            Joint Trench Billings            Journal Vouchers, Registers, Payroll, Batches            Subsidiary Capital Records</p>	Life of Plant + 25 Years	Financial Reporting Operational Accounting
		<p>Journal entries and records related to the transfer of charges between accounts and summaries of account information for Capital/Fixed Assets for both Regulated and Non-regulated entities. These relate to fixed assets: mains, services, meters, regulators, tools, vehicles, equipment, buildings, IT related items (hardware, software, etc.), etc.</p> <p>Confidential: Yes            Contains PII: No            Historical: False            Vital: True</p>			
55	Finance	Ledgers and Trial Balances	<p>Proofs            Trial Balance Report</p>	Indefinite	Financial Reporting
		<p>Records related to the general and subsidiary ledgers, the year-end ledger, and trial balances. Includes the actual general ledger that summarizes all corporate accounts and trial balances. Includes changes made to entries due to reconciliations. For GL reconciliation workpapers, see RRS #308 General Ledger Account Reconciliations.</p> <p>Confidential: Yes            Contains PII: No            Historical: False            Vital: True</p>			

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
49	Finance	Preliminary Financial Statements	<p>Preliminary reports or workpapers to support final documentation of Financial Statements.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>Miscellaneous Report Equipment Rentals/purchases Prelim ACK Reports Prelim Balance Sheets Prelim Budget Prelim Detail Pages Prelim FERC Balance Report Prelim Income Statements</p>	<p>Dispose preliminary documents upon Finalization</p> <p>Financial Reporting</p>
57	Finance	Scorecards & Metrics	<p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>	<p>Scorecard and Metrics Tracking Scorecards</p> <p>Active + 3 Years</p>	<p>Financial Planning &amp; Analysis Operations Contoller</p>
81	Gas Marketing	Business Records and Tracking Reports	<p>Records to track pending and closed transactions and other standard business records.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Backtesting Reports Cash receipt statement from Bank D&amp;T FasTracker Audit Reports D&amp;T MLB Settlement Report D&amp;T Monaco Open Book Instant Message History Park and Loan Confirms and Capacity Release Awards Quarterly Credit Rating Spreadsheets Retail Customer Usage Reports Retail Transaction Assessments Trade Summary Report</p> <p>2 Years</p>	<p>Spire Marketing</p>



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
28	Gas Marketing	Customer Agreements - Spire Marketing	<p>Agency Agreements Confidentiality Agreements Leases Letters of Credit Miscellaneous Service Agreements Parental Guarantees RFP's and Bids (for successful bids) Rent Invoices</p>	Expiration of Contract + 6 Years	Spire Marketing
		<p>Agreements related to customer credit, services and various aspects of the customer relationship.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>			
31	Gas Marketing	Gas Agreements - Master Contracts	<p>3rd Party Gathering Invoices 3rd Party Severance Tax Statements 3rd Party Transportation Invoices 3rd Party Utility Invoices FERC Form 552 Spreadsheet GISB Master Contracts MoPSC Cost Allocation Spreadsheet NAESB Master Contracts PQ Deal Spreadsheet Purchase and Sale Invoices Purchase, Sale, Transportation and Park and Loan Transactions Storage Contracts Storage Invoices Trading/Non-Trading Signoff Transportation Invoices Transportation and Park and Loan Contracts</p>	Expiration of Contract + 6 Years	Spire Marketing
		<p>Contracts for transportation, sale, purchase, storage and or management of gas. Records related to the transaction of Gas Agreements, such as invoices, logs and tracking of transactions.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>			
30	Gas Marketing	Software License and Maintenance Agreements		Life of Software + 6 Years	Spire Marketing
		<p>Agreements and supporting documents for software licenses and maintenance. Includes correspondence, statements of work, and amendments.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>			

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
27	<b>Gas Marketing</b>	<b>Tracking and Business Metrics Reporting</b>	<p>ACH Wire / Transfer Requests Budget Analysis Contractual Obligation Spreadsheets GOI Requests Hedge Documentation ICE Transaction Summaries Journal Entry Templates WEBADI Excel Net Out Summary Physical MTM Analysis included in FAS MGR Report Purchase and Sale Confirms Retail Trigger Summary Storage/Cycling Analysis</p>	<b>6 Years</b>	<b>Spire Marketing</b>
	<p>Reports, summaries and spreadsheets to track transportation, pricing, sales and hedging.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>				
29	<b>Gas Marketing</b>	<b>Trade Transactions and Daily Reports</b>	<p>Backtesting Spreadsheet Broker Confirms and Daily Broker Statement Counterparty Trade Confirmations D&amp;T End of Quarter Audit Reports Daily Forward Price Curves (Last Day of Month kept) Daily Transaction Summary Daily and Monthly Price Reporting Spreadsheets (Regulatory report) Liberty AMA Acct Monthly Packet</p>	<b>7 Years</b>	<b>Spire Marketing</b>
	<p>Records of trade transactions - confirmations and/or daily reports of transactions, and records/reports of price and risk analysis.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>				
292	<b>Gas Supply</b>	<b>CRM Records</b>	<p>System Control Room Management Plan and associated records Shift Handover records Point verification records</p>	<b>Later of 1 Year of last 2 validations</b>	<b>Gas Control</b>
	<p>Control room management records for pipeline controllers monitoring and controlling with a System Control &amp; Data Acquisition (SCADA) system.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
270	Gas Supply	Climatological Data		Permanent	Gas Supply
	Climatological Data (dating from 1960 forward)				
	Confidential: No Contains PII: Historical: False Vital: False				
178	Gas Supply	Contracts and Agreements - Gas Supply		Current + 6 Years	Gas Supply
	Contracts and agreements for the transportation, sale, purchase and storage.		Gas Transportation and Storage Contracts Term Deal Gas Supply Letter Agreements		
	Confidential: No Contains PII: Historical: False Vital: True				
269	Gas Supply	Curtailement / Critical Use		25 Years	Gas Supply
	Curtailement index, Service to Others				
	Confidential: No Contains PII: Historical: False Vital: False				
176	Gas Supply	Daily/periodic records of sales		Current + 6 Years	Gas Supply
			Gas Transportation Customer Nominations Off-System Sales Confirmations Spot Purchase Confirmations		
	Confidential: No Contains PII: Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
162	Engineering & Gas Operations	ER Monitoring System records		Life of Facility	Instrumentation and Control
	Monitoring system in place for low pressure system to record pressure and alarm if pressure is not appropriate.				
	Confidential: No Contains PII: Historical: False Vital: False				
172	Engineering & Gas Operations	Energy Information Administration Reports (EIA)		7 Years	Underground Storage
	Federal reports related to gas storage levels.		Monthly EIA Reports Weekly EIA Reports		
	Confidential: No Contains PII: Historical: False Vital: False				
160	Engineering & Gas Operations	Gas Control Reports		6 Years	Gas Control
	Records of gas control reports.		Btu Reports Daily Reports Monthly Reports Measurement Data maintained outside the SCADA system		
	Confidential: No Contains PII: Historical: False Vital: False				
171	Engineering & Gas Operations	Inspection and Testing Reports		Permanent	Underground Storage
	Records related to gas storage levels.		Fire Extinguisher Inspection Report Missouri Mechanical Integrity Test Semi-Annual Propane Relief Valve Inspection Report Semi-Annual Safety Inspection UGS Annual Mobile Leak Survey UGS Annual Relief Valve Inspection Report UGS Annual Valve Inspection Report UGS Semi-Annual Propane Valve Inspection Report Weekly Oil Reports Weekly Water Injection Reports		
	Confidential: No Contains PII: Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
163	Engineering & Gas Operations	Natural Gas Pipeline Transmission Records		6 Years	Gas Control, LNG
	Records and logs summarizing the quantities of natural gas transmitted in pipeline.		Daily Reports (Natural Gas Transmission) Delivery Allocations (Natural Gas Transmission) Gas Measurement Statements Purchase Gas Allocations Volume Allocation Reports LNG Daily / Weekly Reports		
	Confidential: No Contains PII: Historical: False Vital: False				
165	Engineering & Gas Operations	Propane Records		Permanent	Gas Control
	Records related to propane storage.		Propane Status Reports Propane Worksheets		
	Confidential: No Contains PII: Historical: False Vital: False				
177	Gas Supply	Records of billing and gas supply charges		7 Years	Gas Supply
	Gas supply charge schedules and bills for transportation and supply.		Daily Position Report GSC Schedules Gas Supplier bills Pipeline bills		
	Confidential: No Contains PII: Historical: False Vital: False				
159	Engineering & Gas Operations	Required Inspections		6 Years	Instrumentation and Control, LNG
	Records related to required inspections.		206 Special station Inspection Electronic Recorder audit trail Facility Inspections Gas Monitor Inspections Gas tool/equipment Calibration/ repair Isolated Regulator Inspections Monitor Station Inspection Odorator Report Odorizer Inspections Odorizer readings Odorometer checks Overhaul Inspections Pressure/ Temperature gauge calibrations Station Safety Inspection - Periodic Pressure Charts Tattletale gauge check		
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
161	Engineering & Gas Operations	Routes and Schedules		5 Years	Instrumentation and Control
	Records related to the routing and scheduling of work in Instrumentation and Control.		Daily routing Daily work sheet Station Change of status Weekly schedule		
	Confidential: No Contains PII: Historical: False Vital: False				
287	Engineering & Gas Operations	SCADA Historical Data		Current +5 Years	Gas Control
	SCADA historical data, alarm archives and event logs		Historical SCADA data Alarm history Controller actions and other SCADA events		
	Confidential: No Contains PII: Historical: False Vital: True				
170	Engineering & Gas Operations	State and Local Permits and Reports		Permanent	Underground Storage
	Records of State and Local permits and reports, and supporting documentation used to provide these reports. Includes well log files that contain the supporting documentation.		MODNR Application For Permit to Drill, Deepen or Plug Back MODNR Injection Well Monitoring Report MODNR Monthly Report of Disposal of Produced Water MODNR Monthly Well Status and Production Report MODNR Well Completion or Recompletion Report and Well Log St. Louis County Application For Authorization To Drill, Deepen, Or Convert A Well St. Louis County Notice of Intention to Drill A Shallow Structure Test		
	Confidential: No Contains PII: Historical: False Vital: True				
169	Engineering & Gas Operations	Storage Reports		Permanent	Compressor Log Sheets Underground Storage
	Records related to gas storage levels.		Underground Storage Daily Report (Hourly) Underground Storage Daily Report (Summary) Underground Storage Monthly Report		
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
168	Engineering & Gas Operations	UGS Weekly Schedule		6 Years	Underground Storage
	Employee weekly schedule records.				
	Confidential: No Contains PII: Historical: False Vital: False				
313	Legal	Compliance Training		Superseded +7	Legal - Compliance
	Records of employee training on internal control procedures, company policies, and compliance related procedures, including training materials and attendance records, but not including environmental, health, and safety training.		Compliance training materials Security & awareness training Protective health information Preventing breaches of PII		
	Confidential: No Contains PII: Historical: False Vital: False				
233	Legal	Contracts and Agreements - General		Expiration of Contract + 10 Years	Legal
	Records related to obligations under contracts, leases, and other agreements with outside parties and the company's employees not covered elsewhere. Additionally includes agreements related to the purchase, transportation and storage of natural gas and oil, and contractual obligations between the Company and third parties for joint trench placement. Includes contract and agreement amendments, breach of contract notifications, employee confidentiality, consent to guidelines, intellectual property, non-compete agreements, and contract management and administration. Also includes corporate matters and disputes that do not progress to litigation.		Advance and Contribution Contracts Annuity Contracts At-Will Employment Agreements Board of Director Hired Third Party Vendor Contracts Business Development Agreements Client Contracts Complete Fresh Start 2 Agreements Confidentiality Agreements (non-employee) Contract Status Reports Contract and Agreement Amendments Contract and Agreement Negotiations Corporate Matters Credit Guarantees (Fuel Contracts) Customer Contracts for New Construction Employee Confidentiality Agreements Employee Consent to Guidelines Employee Intellectual Property Agreements Employee Non-Compete Agreements Employment Agreements Energy Management Consultancy Agreements Exhibits (Fuel Contracts)		
	Confidential: Yes Contains PII: No Historical: True Vital: True				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
			<ul style="list-style-type: none"> <li>Exhibits (General)</li> <li>Financial Trading Contracts</li> <li>Franchise Agreements</li> <li>Gas Contract Amendments</li> <li>Gas Service Contracts</li> <li>Gas Storage Contracts</li> <li>Gas Supplier Contracts</li> <li>Gas Trading Contracts</li> <li>Gas Transportation Contracts</li> <li>Hardware Lease and Support Agreements</li> <li>Intellectual Property Agreements</li> <li>Intercompany Agreements</li> <li>Large Volume Sales Contracts</li> <li>Legal Agreements</li> <li>Licensing Agreements</li> <li>Maintenance and Operations Contracts</li> <li>Natural Gas Temporary Interruptible Service Agreements</li> <li>Non-Disclosure Agreements</li> <li>Notifications of Contract Breach or Dispute (Employee)</li> <li>Notifications of Contract Breach or Dispute (General)</li> <li>Officer and Director Employment Agreements</li> <li>Official Correspondence and Notes (Contracts - General)</li> <li>Retail Agreements</li> <li>Retails Agreements</li> <li>Safety Appendices</li> <li>Separation Agreements</li> <li>Software licenses and Escrow Agreements</li> <li>Statements of Work (General Contracts)</li> <li>Third Party Insurance Certificates</li> <li>Transfer Agent Contracts</li> <li>Vendor Contracts</li> <li>Vendor Insurance Certificates</li> <li>Wholesale Agreements</li> </ul>		



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
234	Legal	Contracts and Agreements - Real Estate Construction and Improvement	<p>Advice and Counsel Records (Contracts - Real Estate Construction)</p> <p>Architect Agreements</p> <p>Construction Bid Records</p> <p>Construction Contracts</p> <p>Construction Disputes</p> <p>Design-Build Agreements</p> <p>General Contractor Agreements</p> <p>Notifications of Contract Breach or Dispute (Real Estate Construction)</p> <p>Official Correspondence and Notes (Contracts - Real Estate Construction)</p> <p>Project Management Agreements</p> <p>Property Improvement Contracts</p> <p>Real Estate Service Contracts</p> <p>Real Estate! Joint Plant   Operating Agreements</p> <p>Statements of Work (Real Estate Construction)</p>	Life of Plant + 6 Years	Legal Facilities
	<p>Records related to contracts and agreements for improvements to real property. Includes construction and property improvement bids, service contracts, and property improvement contracts. Also includes disputes that do not progress to Litigation and Claims</p> <p>Confidential: Yes</p> <p>Contains PII: No</p> <p>Historical: False</p> <p>Vital: True</p>				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
235	Legal	<b>Contracts and Agreements - Real Estate Purchase, Sale, and Access</b>	<p>Records related to the purchase and sale of real estate and the proof of ownership and access to real estate. Includes real estate purchase agreements, deeds, titles, easements, leases, sale agreements, and environmental reports. Also Includes disputes that do not progress to Litigation and Claims - General.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>	<p>Building Property Descriptions Closing Records Customer Obligations Records Deeds Encroachments Environmental Impact Statements Field Surveys and Land Ownership Easements Leases; Contracts and Agreements Related to Leased Properties Liability Waivers Non-Legal Contract Disputes Notifications of Contract Breach or Dispute (Real Estate Purchase) Phase I and Phase II Environmental Reports Real Estate Due Diligence Real Estate Purchase Agreements Real Estate Purchase and Sale Easements Real Estate Sale Agreements Real Estate Titles Transmission Line Easements</p>	Permanent	Legal Facilities Right of Way
232	Legal	<b>Copyrights, Trademarks, and Patents</b>	<p>Records related to the registration and management of copyrights, trademarks, and foreign or domestic patents. Includes trademark records, patent applications, copyright records, and related correspondence. Also includes abandoned applications and records related to copyright infringements.</p> <p>Confidential: Yes Contains PII: No Historical: True Vital: True</p>	<p>Abandoned Applications Copyright   Trademark / Patent Applications Copyright Records Correspondence (Copyrights, Trademarks, and Patents) Infringements Patent Records Patent Registrations Trademark Records Trademark Registrations Trademark Search Reports</p>	Current + 6 Years	Legal

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
312	Legal	Corporate Compliance	Hotline complaints Associated investigations	7 Years	Legal - Compliance
	Records of Corporate compliance.				
	Confidential: Yes Contains PII: No Historical: False Vital: False				
245	Legal	Governmental Compliance And Reporting	FERC Compliance Related Documents Federal Trade Commission Pre-Merger Notifications Final ACK Reports Legal Local Government Compliance Records NYSE Affirmations	7 Years	Corporate Secretary Regulatory
	Records created, managed and/or submitted to governmental and standards agencies (including FERC) to comply with local, state and federal requirements not covered elsewhere. Includes federal and state governmental compliance records and non-rate case PSC				
	Confidential: Yes Contains PII: No Historical: False Vital: True				
224	Legal	Insurance Analysis and Reporting	Insurance Inspections Insurance Policy Coverage Reports Insurance Risk Analyses Loss Control Inspections	No Longer Than 3 Years	Legal
	Records related to the analysis and summary of insurance programs. Includes insurance policy coverage reports and insurance risk analyses.				
	Confidential: No Contains PII: Historical: False Vital: True				
227	Legal	Insurance Certificates	Company Insurance Certificates Vehicle Certificates of Insurance	Life of Policy + 6 Years	Legal
	Records related to legal proof of insurance coverage. Includes company-issued insurance certificates.				
	Confidential: Yes Contains PII: No Historical: False Vital: True				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
230	Legal	Insurance Policies	<p>Liability Records related to insurance coverage for senior executives, product liability, exposure to hazardous substances, certification for workers' compensation insurance (if applicable), whether purchased from an insurance carrier or from the state, and policies affecting liability not covered elsewhere or other problems manifesting themselves long after the policy terminates. Includes future liability insurance program payment records and program manuals.</p> <p>Confidential: Yes Contains PII: No Historical: True Vital: True</p>	<p>Life of Policy + 6 Years</p>	Legal
			<ul style="list-style-type: none"> <li>Crime Shield</li> <li>Cyber Security Policies</li> <li>Directors and Officers Insurance Policy Amendments and Riders</li> <li>Directors and Officers Policies</li> <li>Executive Insurance Policies</li> <li>Executive Insurance Policy Amendments and Riders</li> <li>Liability Insurance Policies</li> <li>Liability Insurance Policy</li> <li>Correspondence</li> <li>Liability Insurance Program Manuals</li> <li>Liability Insurance Program Payment Records</li> <li>Liability Proofs of Payment Records</li> <li>Property Policies</li> <li>Workers' Compensation Policies</li> <li>Workers' Compensation Policy Amendments and Riders</li> <li>Workers' Compensation Policy</li> <li>Correspondence</li> <li>Workers' Compensation Policy</li> <li>Underwriting Data</li> </ul>		
228	Legal	Insurance Policies - General	<p>Records describing and administering corporate insurance programs that provide coverage for company property, crime insurance policies or policies indemnifying the company against loss arising from the acts of employees holding positions of trust. Includes underwriting data, insurance policies, amendments and riders, and proofs of payment. Does not include Liability Insurance Policies.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>	<p>Life of Policy + 6 Years</p>	Legal
			<ul style="list-style-type: none"> <li>Crime Insurance Policies</li> <li>Cyber Security Policies</li> <li>Fidelity Bonds</li> <li>Insurance Policies</li> <li>Insurance Policies Amendments and Riders</li> <li>Insurance Policies and Related</li> <li>Correspondence</li> <li>Insurance Program Manuals</li> <li>Notary Bond Submittals</li> <li>Proofs of Premium Payment</li> <li>Property Insurance Correspondence</li> <li>Property Insurance Policies</li> <li>Property Insurance Policy Amendments and Riders</li> <li>Property Insurance Program Manuals</li> <li>Surety Bonds</li> </ul>		

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
226	Legal	Licenses, Permits, and Certifications	<p>Records related to licenses, permits, and certifications that are obtained from government agencies in order to perform certain tasks. Includes building permits, zoning permits, construction permits, business licenses, and environmental permits.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	<p>Air Quality Permits Building Permits Business Licenses (Tax) Business Permits Certificate of Need Certificates of Occupancy Certifications Construction Permit Applications Construction Permits</p>	<p>Expiration of License, Permit or Certification + 5 Years</p> <p>Legal, Facilities, Tax, Environmental</p>
231	Legal	Litigation	<p>Records related to anticipated, threatened or asserted litigation for a range of issues including employment, environmental, intellectual property, and product liability. Additionally includes records related to disputes involving third parties, including vendors or employees, in which the company is not directly involved but has been requested to provide information regarding the third party dispute. Examples include court orders, protective orders, subpoenas, pleadings, discovery records, attorney work products, legal opinions, transcripts, exhibits, and final judgments.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>	<p>Affidavits Attorney Work Product Case Files Certificate of Need Claims Court Orders Depositions Discovery Documents Discovery Records Evidence Records Exhibits - General Exhibits - Plant Litigation Final Judgments / Releases Incident Files Legal Opinions Litigation Motions Pleadings - General Protective Orders Responses to Discovery Requests Service of Process documents Small Claims Transcripts Trial Documents</p>	<p>Close of Case + 6 Years</p> <p>Legal Claims</p>

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
237	Legal	Mergers, Acquisitions And Divestitures		Permanent	Legal
		Records related to the acquisition of, merger with, or divestiture of business units.	Documentation Agreements NDAs		
		Confidential: Yes Contains PII: No Historical: True Vital: True			
217	Legal	OSHA 300 & 300A reporting forms		6 Years	Workers' Compensation
		Confidential: Yes Contains PII: No Historical: False Vital: True			
243	Legal	Records related to administration of the department		2 Years	Claims
		Records created and used to manage the Claims department.	Allowed out files Analysis of Dig-up claims Claim Department score cards Liaison meeting notes Monthly reports on claims activity		
		Confidential: No Contains PII: Historical: False Vital: False			
225	Legal	Reports related to administration of the department		5 Years	Legal
		Retention of documents and reports generated solely for administration of the department.	Department scorecard (no longer generated) Finance Report Monthly report		
		Confidential: No Contains PII: Historical: False Vital: False			

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
254	Legal	Subpoena and Third Party Correspondence	Subpoenas Third Party Correspondence	Response + 6	Legal
	Subpoena and Third Party Correspondence				
	Confidential: Yes Contains PII: No Historical: False Vital: False				
218	Legal	Workers' Compensation Medical Records	Medical records related to Workers' Compensation claims	Termination of Employment + 40 years	Workers' Compensation
	Confidential: Yes Contains PII: Yes Historical: False Vital: True				
219	Legal	Workers' Compensation Wire Transfer Request	Wire Transfer Request and supporting documentation	1 Year	Workers' Compensation
	Confidential: Yes Contains PII: Yes Historical: True Vital: False				
216	Legal	Workers' Compensation claims including legal documents	Bill Review Documentation Claims Management Records First Report of Injury Workers' Compensation Claim Settlement documents Workers' Compensation Claim Supporting documentation Workers Compensation Division claims documentation Workers Compensation Annual Report to State	Current + 7 Years	Workers' Compensation
	All documents related to claims administration of workers' compensation claims by employees.				
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
192	Human Resources	5500s and Supporting Documentation	5500s Supporting documentation for 5500s	7 Years	Compensation and Benefits
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
215	Human Resources	Account Reconciliation	Medical Draft Bank Statement Reconciliations US Bank Account Reconciliation for Payroll Drafts US Bank Account Reconciliations for Management and Retiree Payroll Withholding Account Reconciliations	7 Years	Payroll
	Records related to reconciliation of various accounts. Confidential: Yes Contains PII: Yes Historical: False Vital: False				
293	Human Resources	Applications for Permanent Employment Certifications	ETA Form 9089 Recruitment report Prevailing wage determination from the NPWC (National Prevailing Wage Center)	Date of Filing Application + 5 years	Talent Acquisition
	Employer copies of applications for permanent employment certification and supporting documentation. Confidential: Yes Contains PII: Yes Historical: False Vital: False				
197	Human Resources	Benefit Billing	401(k) Record Keeper Billing Statements Excess Insurance, Salary Continuance, Voluntary Life Billing Statements	7 Years	Compensation and Benefits
	Billing records for employee benefits provided. Confidential: Yes Contains PII: Yes Historical: False Vital: False				



## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
189	Human Resources	<b>Benefit Enrollment, Participation and Plan Development - 401K</b>	<p>Records related to defining, designing, and developing 401(k) plan(s), and the enrollment and participation of employees in 401(k) and records related to money borrowed by an employee against his or her 401(k). (Records may be held by TPA) Records must be retained as long as the last payment is made to a participant or beneficiary or alternate payee.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>401(k) Plan Billing Statements Beneficiary Designation Change Forms Benefit Enrollment Benefit Plan Actuarial Reports Benefit Plan Amendments Benefit Plan Analyses and Reports Benefit Plan Conversion-MoNat Benefit Plan Documents Distribution Records Loan Documents and Records Rollover Records Summary Plan Documents</p>	Life of Benefit Plan + 6 Years	Compensation and Benefits
196	Human Resources	<b>Benefit Enrollment, Participation and Plan Development - Disability (S)</b>	<p>Records related to defining, designing, and developing benefit plans, and participation of employees in benefits programs. (Records may be held by TPA). Records must be retained as long as the last payment is made to a participant or beneficiary or alternate payee.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>Beneficiary Designation Change Forms- Pension Benefit Plan Actuarial Reports- pension Benefit Plan Amendments Benefit Plan Analyses and Reports- pension investment committee; 401(k) investment committee quarterly Benefit Plan Conversion-MoNat Benefit Plan Documents Change of Address notification for term vested and alternate payee for QDRO Summary Plan Documents</p>	Life of Benefit Plan + 6 Years	Compensation and Benefits
193	Human Resources	<b>Benefit Enrollment, Participation and Plan Development, - Pension</b>	<p>Records related to defining, designing, and developing the pension, and participation of employees in the pension. Records must be retained as long as the last payment is made to a participant or beneficiary or alternate payee.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>Beneficiary Designation Change Forms Benefit Plan Actuarial Reports Benefit Plan Amendments Benefit Plan Analyses and Reports- Benefit Plan Calculations Benefit Plan Conversion-MoNat Benefit Plan Documents Change of Address notification for term vested and alternate payee for QDRO Summary Plan Documents</p>	Life of Benefit Plan + 6 Years	Compensation and Benefits

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
191	Human Resources	<b>Benefit Enrollment, Participation, and Plan Development (Health, Visio</b>	<p>Records related to documenting, defining, designing, and developing benefit plans and the enrollment and participation of employees in benefits programs for health insurance, dental, and vision plans. Also includes records related to benefit plan documents. Records must be retained as long as the last payment is made to a participant or beneficiary or alternate payee.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>Beneficial Plan Actuarial Reports Benefit Enrollment and Application Forms COBRA (continuation coverage letters, COBRA qualifying event forms, HIPAA Cert of Coverage forms) Correspondence (enrollment related) Dental Insurance Payments Dental and Vision (eligibility details) Disease Management Payments Medical Plan Payments New Hire Letters Open Enrollment Forms Prescription Plan Payments TPA Payments Vision Payments</p>	<b>Life of Benefit Plan + 6 Years</b>	<b>Compensation and Benefits</b>
190	Human Resources	<b>Benefit Plan Management and Administration</b>	<p>General management and administration of benefit plans, such as 401(k), retirement plans, pension plans, stock purchase plans, disability, leave of absence, and tuition reimbursement. Includes records related to the assessment, selection, and renewal of benefit plan vendors.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>401 (k) Plan Administration 401 (k) Plan Communications 401(k) Match Actuarial Studies Annual Summary of Stock Option Grants Annual Valuation Reports Benefit Communications Benefit Plan Administration Correspondence Benefit Plan Administration Records Benefit Plan Communications Director Retirement Plans General Employee Communications (related to Benefit Plans) Retirement Plan Appeals Vendor Assessment Records Vendor Renewal Records Vendor Selection Records</p>	<b>Life of Benefit Plan + 6 Years</b>	<b>Compensation and Benefits</b>

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
201	Human Resources  Confidential: Yes Contains PII: Yes Historical: False Vital: False	Consultant/3rd Party Agreements	3-D Consulting CompAnalyst SuccessFactors Towers Watson Transentive	Current + 6 Years	Compensation and Benefits
248	Human Resources  Records providing a history of contract and temporary employment from initial hiring, including performance appraisals and transfers. Also includes employment applications, letters of acceptance, resumes, and employee relocation records.  Confidential: Yes Contains PII: Yes Historical: False Vital: False	Contract and Temporary Employee Personnel Records - General	Employment Applications Resumes Position Requisition	Active +6	Talent Acquisition
185	Human Resources  Qualification files for all employees who operate commercial motor vehicles in the course of his or her employment.  Confidential: Yes Contains PII: Yes Historical: False Vital: False	Driver Qualification	MVR Annual Review Annual Motor Vehicle Report (MVR) Employment Application Certificate of Violations Medical Examiner's Certificate Pre-Employment Drug and Alcohol Documents Previous Employment Check Road Test Certificate or CDL	Termination of Employment + 3 Years	HR Operations
181	Human Resources  Records related to drug and alcohol screenings required by all individuals applying for a position or for periodic and random testing. Negative lab results.  Confidential: Yes Contains PII: Yes Historical: False Vital: True	Drug and Alcohol Testing - Negative Test Results	Chain of Custody Forms (Negative Test Results) Negative Test Results	2 Years	HR Operations

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
182	Human Resources	<b>Drug and Alcohol Testing - Positive Test Results and All Follow Up and</b>	<p>Records related to drug and alcohol screenings required by all individuals applying for a position or for periodic and random testing. Positive lab results.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Annual MIS reports Chain of Custody Forms (Positive Test Results) Follow Up and Return to Work Results Post-Accident Test Results Positive Test Results SAP Evaluation and Recommendation</p>	<p>Termination of Employment + 5 Years</p> <p>HR Operations</p>
326	Human Resources	<b>Drug-Free Workplace Testing Records</b>	<p>Employer records of drug-free workplace programs, such as collection and chain of custody documentation, test reports and results, and reasonable suspicion documentation.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Collection and chain of custody documentation Test reports and results Reasonable suspicion documentation</p>	<p>3 Years</p> <p>Human Resources</p>
203	Human Resources	<b>Employee Absence Documentation</b>	<p>Records related to employee absence, application of the Company sick absence policy to employees covered by collective bargaining agreements with the Company and the Family and Medical Leave Policy with respect to all employees, excludes medical records.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Absence Reports Correspondence (Leaves of Absence) Doctors' Authorizations for Time Off</p>	<p>Termination of Employment + 6 Years</p> <p>HR Operations</p>
195	Human Resources	<b>Employee Benefit Account Records</b>	<p>Records related to individual employee benefit accounts. Records must be retained as long as the last payment is made to a participant or beneficiary or alternate payee.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>DIP Statements</p>	<p>Life of Benefit Plan +6 Years.</p> <p>Compensation and Benefits</p>

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
187	Human Resources	Employee Handbook		Active + 7 Years	HR Services
	Handbook of employee policies and practices that employees must comply with in the course of employment.				
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
194	Human Resources	Employee Medical Records		Termination of Employment + 40 years	HR Operations
	Records documenting individual employee medical history. Includes any employee medical records required under OSHA or equivalent (e.g. blood testing, respirator physicals, and hepatitis)		Contractor Medical Records Employee Medical Records Employee Work limitations Physician Reports		
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
179	Human Resources	Employee Recruitment and Selection		Completion of Recruitment + 2 Years	Talent Acquisition
	Records related to personnel requests, job applications, testing, advertising, position descriptions, and interviews. Includes job postings, help wanted ads, assessment tests, and background checks. Recruitment records for hired employees become part of the personnel file		Applications Approved Personnel Requisitions/Vacancies Criminal Background Checks Interview Notes (notes during by interviewers during the interviewing process ) Job Postings Offer Letters Selection Criteria Template References- Reference Checks Resumes		
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
208	Human Resources	Employee Recruitment and Selection Testing		4 Years	Talent Acquisition
	Records related to Pre-Hire and current union assessment tests.		Pre-employment Job Analysis: I&C 1st and 2nd class; CSR, SAID Helper/special Adjust, C&M Laborer		
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
206	Human Resources	Employee Reports		Termination of Employment + 6 Years	Employee Relations
	Documents and reports related to individual employees and/or application of policies to those employees, such as drug and alcohol testing, driver's license policy, grievances.		Driver's License File Grievance File Industrial Relations Employee File		
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
212	Human Resources	Employee Time and Attendance		7 Years	Payroll
	Records related to the identification and reporting of hours worked by employees. Includes all timesheets submitted to payroll in order to document hours worked for a particular period.		Time Entry Records for Local 194 Time Entry Records for Local 6 Time Records		
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
213	Human Resources	Employee Time and Attendance (Federal Contract)		Completion of Contract + 6 Years	Payroll
	Records related to the identification and reporting of hours worked by employees. Includes all timesheets submitted to payroll in order to document hours worked for a particular period.		Time Entry Records for Local 194 Time Entry Records for Local 6		
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
259	Human Resources	Employee Verifications	Employee Verifications	1 Year	Payroll
	Forms filled out by Payroll when asked to verify employment by outside companies. For example, verifying employment for a bank loan.				
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
294	Human Resources	Employment Background Checks		5 Years	Talent Acquisition
	Background check records procured for employment purposes, such as consumer reports, investigative consumer reports, related notices and disclosures, and adverse action documentation.				
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
184	Human Resources	Equal Employment Opportunity		Current + 4 Years	HR Services - Compliance & Diversity
	Records documenting compliance with company equal employment policies. Includes reports that are required to be filed with the Equal Employment Opportunity Commission (EEOC) and the Department of Labor (DOL) identifying workforce demographics.		Office of Federal Contracts Compliance Program (OFCCP) Compliance efforts such as: Affirmative Action Plans Quarterly Goal Progression Reports EEO-1 Reports VETS4212 Reports Outreach/Good Faith Efforts State Job Board Postings		
	Confidential: Yes Contains PII: Yes Historical: False Vital: True		Applicant Flow Logs		

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
271	Human Resources	HIPAA Privacy and Security Records	<p>Documents Retained Pursuant to HIPAA Privacy and Security Policies and Procedures</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>Privacy notices. Disclosure information. Participant authorizations. Requests for any accountings provided to participant. Complaints received and any information relating to the disposition of complaints Breach notifications Requests for related information. Plan document. HIPAA Privacy Certification and Designation of Personnel. Business associate agreements. Employee Certification and Confidentiality Agreements. Risk analysis reports and risk management activities. Workforce training activities.</p>	Termination of Employment + 6 Years	Health Benefits Human Resources
257	Human Resources	Historical Compensation Records	<p>Historical Compensation Records</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	4 Years	Compensation and Benefits	
311	Human Resources	I-9 Forms	<p>I-9 Forms used during recruitment process.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	I-9 Forms	Date of Hire + 3 Years or Termination + 1 Year, whichever is later	Talent Acquisition



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
180	Human Resources	Immigration and Naturalization	Employee Immigration Files H-1 B Visa Documentation Labor Department Audit Records Naturalization Records	Termination + 3 Years	Talent Acquisition
	Records related to the immigration and naturalization of employees transferring to and from facilities. Includes federal Form I-9 which certifies employee identity and eligibility to work in the United States.  Confidential: Yes Contains PII: Yes Historical: False Vital: False				
200	Human Resources	Job Descriptions	Job Analysis Job Descriptions	Superseded + 4 Years	HR Operations
	Confidential: Yes Contains PII: Yes Historical: False Vital: False				
214	Human Resources	Payroll Accounting Records	Bonus Register Journal Entries for Financial Reporting Labor Distribution Cost Records Payroll History Payroll Records Payroll Registers Payroll Reports Payroll Tax Clearings Distribution Payroll Tax Remittance Payroll Vouchers SAID Daily Register Vehicle Distribution Wage Records	7 Years	Payroll
	Records related to payroll accounting.  Confidential: Yes Contains PII: Yes Historical: False Vital: True				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
210	Human Resources	Payroll Employee File, Voluntary Deductions and Direct Deposit Electio	<p>Records related to employee direct deposit payroll.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>ACME Cards Address Changes Credit Union Forms Direct Deposits Employee Deductions for Charitable Donations PAC Contributions Pay Adjustment Payroll Transfer Authorization (F.121a) Savings Bond Forms (historical) Union Dues Union Dues Register United Way Forms W-4 Forms</p>	Termination of Employment +7 Years	Payroll
211	Human Resources	Payroll Taxes and Involuntary Deductions and Withholdings	<p>Records related to the federal and state taxes paid, unemployment taxes, payment to third parties of amounts garnished from employee wages as required by court order and/or federal levies and payroll accounting records. Includes federal withholding tax returns, payroll tax data reports, tax workpapers, and W-2 forms. Also include rates of taxation, employment and wage information for terminated employees who are requesting unemployment compensation. Does not include court orders and levies.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>1099R Forms Assignments and Attachments Child Support Orders Company Car Mileage FICA Records Federal Withholding Tax Returns Form 941 Quarterly Withholding Tax Returns Form 945 Federal Withholding Tax Returns (Pension) Garnishment Accounting Reports Garnishment orders and files Local Withholding Forms Payroll Sign-off Documents Payroll Tax Data Reports Payroll Vouchers State Unemployment rate calculation State Withholding Forms Tax Levy Orders Tax Workpapers W-2 Forms W-4 Forms</p>	7 Years	Payroll

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
198	Human Resources	Pension Calculations and Records	Employee Earnings Records (Statement of Earnings) Pension Calculation Records	Life of Benefit Plan + 6 Years	Compensation and Benefits
	Records related to underlying documents supporting pension calculations.  Confidential: Yes Contains PII: Yes Historical: False Vital: True				
183	Human Resources	Personnel Records - General	Disciplinary Notices - Education and Training Items Employment Applications Offer Letters Performance Reviews Payroll authorizations/deductions/tax Performance Reviews Resignation Notices Performance Appraisals Performance Improvement Plan (PIP) RC ID Example Example ID Transfer Requests - requests from union employees to be transferred from one department to another References Resumes Termination Checklist	Termination of Employment + 7 Years	HR Operations
	Records providing a history of employment from initial hiring, including promotion, performance appraisals, and transfers. Includes employment applications, letters of acceptance, performance appraisals, and resumes. Excludes temporary employee personnel records.  Confidential: Yes Contains PII: Yes Historical: False Vital: True				
202	Human Resources	Reports	150% Over the Average SA Report Department Score Card Driver's License Report Drug / Alcohol Report Light duty reports Occurrence Progression Report	6 Years	Employee Relations
	Reports generated with respect to the operation of the Industrial Relations department.  Confidential: Yes Contains PII: Yes Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
204	Human Resources	Security Incidents and Investigations	<p>Records related to security incidents and investigations involving or related to Company employees or property. Includes non-violent crime investigations and property damage investigations. Excludes investigations that lead to litigation or investigations related to employee misconduct or alleged harassment.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Attorney Work Product Investigations Complaint Hotline Records if related to employee conduct Crime Investigations Employee / Contractor Misconduct Cases Employee Investigation Files Investigation Files Investigation Photographs Threats / Harassment Investigations if related to employees</p>	<p>Close of Case + 6 Years</p> <p>Employee Relations</p>
199	Human Resources	Stock Option Administration	<p>Records related to the administration of stock purchase plans.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>Annual Summary of Stock Option Grants Employee Stock Option Plan Documentation Equity Grant Records Officer Stock Options, Director Stock Options Optionee Allocation Schedules Options Exercise Documentation Stock Option Grants Documentation Stock Option Summaries Stock Option, Time Based and Performance Contingent Restricted Stock Agreements</p>	<p>Life of Benefit Plan + 6 Years</p> <p>Compensation and Benefits</p>
188	Human Resources	Training	<p>Materials related to available courses and records of individual training on various topics related to skill development, professional development, implementation of new processes and other business and management training. Excludes operational and/or qualification training.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>AAIM Employer Association Training Materials American Gas Association (AGA) Training Materials Dale Carnegie Training Materials ESRI Training Materials</p>	<p>Life of Training Course + 7 Years</p> <p>Training</p>

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
209	Human Resources	Training and Development Programs	<p>Records related to the creation and operation of corporate training and development programs. Includes course manuals, schedules, and course evaluation sheets. Does not include training attendance and certification records.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Career Development Program: Administrative Personnel; Participants, development assessments Leadership Development Program: Participants, coaches, development assessments Post-Hire Assessments</p>	Life of Training Program + 7 Years	Organizational Effectiveness
186	Human Resources	Union Employee Transfers	<p>All records related to the movement of Union employees between positions including bids.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Bid sheets Company-wide Job Bids Special Transfer Notices- openings posted Move notices</p>	1 Year	Human Resources, Field Ops
207	Human Resources	Union Relationship	<p>Records related to agreements, collective bargaining agreements, work practices, grievances and arbitrations, negotiation notes and related documentation for union employees.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Arbitrations and summary of decision Collective Bargaining Agreements Documentation of Issues Related to Union Employees Grievances and analysis report Historical Wage Rate Negotiation Notes Subject Files Termination &amp; Resignation Reports</p>	Permanent	Employee Relations
325	Human Resources	Workforce Development Program Selection and Operation	<p>Records of apprenticeship program selection and operation, including applicant qualifications, applicant interviews, selection bases and results, compensation and training, affirmative action plans, and other required compliance records.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Apprenticeships Co-ops Internships</p>	5 Years	Human Resources - Talent Acquisition

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
43	Information Technology	Employee Permission and Access		3 Years	Infrastructure and Security Services
	Records related to establishing employee permission, security and access to IT systems.		SARF Access Form VPN Documentation SysAid Tickets		
	Confidential: No Contains PII: Historical: False Vital: False				
47	Information Technology	IT Projects		Current + 3 Years	Project Management
	Records related to the management of internal IT projects, special studies, analyses, and other department events not covered elsewhere. Includes project notes, presentations, special studies, project plans, and meeting minutes. Excludes projects related to legal matters.		Action Item Log MGE integration project Project Update Reports Requests for Information Requests for Proposals newBLUE project		
	Confidential: No Contains PII: Historical: False Vital: True				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
41	Information Technology	Information Systems Development, Management, and Administration	<p>Design Documents            Information Technology Audits            Documentation for Migration and Systems Conversions            Functional and Technical Requirements            Information Architecture            Design Information            Architecture Design            Change Management Ticket &amp; Documentation (such as project charters, internal testing, documentation for migration and systems , logs, gate reviews, final sign off, etc.)            Internal Testing            Layout of Hardware            Network Servers and Printer Configurations            Network and Server Storage Space Allocation            Program Source Codes            Reference Manuals            Scope Documents            Spire1 System &amp; Documentation            Asset management tracking and service tags            Documentation about decommissioned assets            Recycling receipts / proof of decommissioned assets</p>	Life of System + 6 Years	Enterprise Architecture Project Management
	Records and documentation for the development, management, and administration of information systems. Provides details of source codes, computer applications, and the information systems environment. Includes ITS Asset Management.				
	Confidential: No Contains PII: Historical: False Vital: True				
44	Information Technology	Infrastructure and Security	<p>Backup/recovery procedures            Disaster Recovery documentation and test results            Topology Diagrams</p>	Current + 3 Years	Infrastructure and Security Services
	Records related to technology infrastructure and changes to the infrastructure.				
	Confidential: Yes Contains PII: No Historical: False Vital: True				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
318	Information Technology	Source Data for Data Processing		Retain Per Applicable Record Series	Information Technology
	Original source data used for data processing and report outputs. Service companies must retain original source data used as input for data processing and data processing report printouts, for the applicable retention periods prescribed for such information.		Various source data used across multiple databases		
	Confidential: Yes Contains PII: Yes Historical: False Vital: True				
45	Information Technology	SysLog Server - Retained for SOX compliance purposes		1 Year	Infrastructure and Security Services
	Confidential: No Contains PII: Historical: False Vital: False				
42	Information Technology	Technical Support		3 Years	Business Support Services
	Records related to external customer and internal employee requests for technical support. These records identify the caller's concern or request for information, and identify the response and resolution. Includes help desk records, problem tracking documentation, and telecommunications service requests.		Emergency After Hours Support by Service Desk Problem Management in Altiris Recurring Changes with Pre-Authorizations Support Incidents by Service Desk		
	Confidential: No Contains PII: Historical: False Vital: False				
20	Internal Audit	Audit Committee		Permanent	Corporate Secretary Internal Audit
	Audit Committee meeting materials presented at regularly scheduled committee meetings.		Audit Committee Meeting Packet		
	Confidential: Yes Contains PII: No Historical: False Vital: True				



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
19	Internal Audit	Internal Audit Workpapers & Reports	Closed Investigations Not Related to Scheduled Audits Internal Audit Risk Assessments Internal Audit reports (SOX, Compliance, Operational) Quality Assurance Workpapers and Reports SOX Monthly Reviews Workpapers (SOX, Compliance, Operational)	Completion + 7 Years	Internal Audit
	Compliance and audit workpapers and reports for all scheduled (on annual audit plan) and unscheduled (ad hoc mgmt. requests) engagements, including documentation, test work papers and reports for Sarbanes-Oxley compliance.				
	Confidential: Yes Contains PII: No Historical: False Vital: True				
66	Investor Relations	Contact Management Database		Permanent	Investor Relations
	The database of contact information and notes for past contacts.				
	Confidential: No Contains PII: Historical: False Vital: True				
65	Investor Relations	Investor Relations	Earnings Call Scripts and/or Slides Earnings News Releases Investor Relations Presentations Q&A Documents	7 Years	Investor Relations
	Records related to communications with security analysts and institutional investors.				
	Confidential: No Contains PII: Historical: False Vital: True				
246	Legislative	Government Relations	Budget Reports Correspondence District Profiles Draft testimony for house and senate committees Election Monitoring Records Election Results Ethics Board Lobby Logs Legislative Issues Legislative Plan MO registered lobbyist documentation Political Issues	Current + 6 Years	Government and Legislature
	Records related to government relations on local, state, and/or federal levels, reflecting issues that have an impact on the company. Includes election monitoring records. Does not include Political Action Committees records.				
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
247	<b>Legislative</b>	<b>Government Relations - Political Action Committees</b>		<b>Current + 6 Years</b>	<b>Government and Legislature</b>
	Records pertaining to local, state, and federal government relations and participation in political activities. Includes political action committee records, fundraising records, political issue records, and correspondence with legislators.		Correspondence Fundraising Records Political Action Committee (PAC) Records		
	Confidential: No Contains PII: Historical: False Vital: False				
141	<b>Operation Services</b>	<b>Annual Capacity and Overpressure Protection</b>		<b>6 Years</b>	<b>Pipeline Safety Compliance</b>
	Annual compliance reports.		Annual Propane Over-Pressure Protection Report Annual Regulator and Relief Capacity Annual Travel Stop Analysis Report		
	Confidential: No Contains PII: Historical: False Vital: True				
144	<b>Operation Services</b>	<b>Asset Construction, Condition Reporting, Repair, and Corrosion Control</b>		<b>Life of Facility</b>	<b>Pipeline Safety Compliance</b>
	Records to document the safety and integrity of facilities, including reports, records of tests performed and installation records required for inspection during the life of the facility.		Biannual Relief Valve Inspections Cathodic Deficiency Repair Cathodic Protection Monitoring Readings Cathodic Protection Rectifier Readings Cathodic Service Inspections Faulty Material Report Leak Repair and Pipe Condition Reports Maximo Leak Repair Maximo Pipe Observation Mechanical Fitting Class 1 Leak Form New Anode Installations Record of Hydrostatic Pressure Test		
	Confidential: No Contains PII: Historical: False Vital: True				
295	<b>Operation Services</b>	<b>Audiometric Test Data</b>		<b>Term + 6 Years</b>	<b>Health and Safety</b>
	Records of audiometric tests conducted for employees.				
	Confidential: No Contains PII: Yes Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
322	Operation Services	Chemical Accident Prevention Response Exercises	Spills	5 Years	Health & Safety
	Records of chemical accident prevention response exercises, including notification exercises and field and tabletop exercises.				
	Confidential: No Contains PII: Historical: False Vital: False				
115	Engineering & Gas Operations	Commercial Installation and Easements/ROW	Commercial New Service Installation Commercial New Service Installation - 2lb Request Easement Vacation / Encroachment Facility Relocation and Adjustment Agreement Utility Agreement/License to Utilize	Permanent	Construction Engineering
	Documents related to commercial new service installation, including easement and right of way documentation. Note: 350s will remain with Construction Services but future documentation will reside with Sales. Easement information is maintained by ROW.				
	Confidential: No Contains PII: Historical: False Vital: True				
174	Operation Services	Company Facilities - Plants and Stations	Atmospheric Corrosion and vaporizers Critical Bond Inspections (Pipeline Safety Compliance) Fire Extinguisher Inspections Hydrostatic test records Propane Cylinder Log Book Propane Facility Inspections (Pipeline Safety Compliance) Relief Valve Inspections	Life of Facility	Pipeline Safety Compliance Plants & Stations
	Inspection and Testing Reports.				
	Confidential: No Contains PII: Historical: False Vital: True				
136	Operation Services	Compliance and Maintenance	ACI Compliance Inside Meter Report ACI Compliance Outside Meter Report Compliance Report Inspection Programs Compliance Scorecard Action Items Compliance Scorecard Meeting notes Main Replacement Tracking reports	2 Years	Pipeline Safety Compliance
	Records generated to track compliance activities in the Maintenance Engineering department.				
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
323	Operation Services	Confined Space & Lockout/Tagout Records		Current + 1 Year	Health & Safety Instrumentation & Control
	<p>Confined space permits and lockout/tagout documentation.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				
133	Operation Services	Design Drawings - Regulator Stations		Life of Facility + 6 Years	Instrumentation and Control
	<p>Design drawings for regulator stations.</p> <p>Design Drawings - Regulator Stations</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				
282	Operation Services	Distribution Integrity Management Plan (DIMP)		Superseded +10 Years	Pipeline Safety Compliance
	<p>Annual compliance report</p> <p>DIMP framework            Appendix files            Supporting data files</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: True</p>				
134	Engineering & Gas Operations	Distribution Operation Support		Life of Facility	Pipeline Asset Management
	<p>Records related to the support of Distribution Operations activities not described elsewhere.</p> <p>AGA Benchmarking Data            CNG System and Maintenance            Directional Boring            ER Systems            NFPA59 updates            SCADA Loads</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
123	Operation Services	Environmental Compliance		Active + 5 Years	Environmental, LNG
	Records and documentation related to compliance with environmental regulations and statutes.  Confidential: Yes Contains PII: No Historical: False Vital: True		Auditing - Environmental Discharge Monitoring Reports Emissions Inventory Questionnaire (EIQ) Environmental Emissions Environmental permits expired Hazardous Waste, Solid Waste filings Monitoring Reports SARA Title III Tier Two Report Storm Water Records SMOP Readings		
122	Operation Services	Environmental Compliance - Disposal and Exposure Records		Permanent	Environmental
	Records documenting the generation, transportation, and disposal of hazardous waste and of non-hazardous wastes, including solid wastes and universal wastes.  Confidential: Yes Contains PII: No Historical: False Vital: True		Above Ground Storage Tank Certificates Above ground Storage Tank Permits / Applications Below Ground Storage Tank Certificates Below ground Storage Tank Permits / Applications Chemical Lab - Gas Operations Reports Hazardous Waste, Solid Waste Disposal Records Spill/Incident Reporting Storage Tanks		
121	Operation Services	Environmental Compliance - Hazardous Substance and Exposure Records		Termination + 40 Years	Environmental
	Records related to hazardous substance and exposure to the environment and individuals.  Confidential: Yes Contains PII: Yes Historical: False Vital: True		Employee Exposure Records Hazardous Waste, Solid Waste Disposal Records Permissible Exposure		
127	Operation Services	Environmental Permits & Identification Numbers		Active + 5 Years	Environmental
	Requirements for records of permits, applications, and identification numbers for environmental activities and operations, such as air, water discharge, universal waste, hazardous waste, hazardous materials, and radioactive materials.  Confidential: Yes Contains PII: No Historical: False Vital: True		Air/Water Permits Hydrostatic Test Permit SPCC SPCC Plans Storm Water Pollution Prevention Plan		

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
120	Operation Services	Environmental Projects		Completion + 7 Years	Environmental
	Required documentation for environmental projects and hazardous materials.		PCB Project-Specific File Folder		
	Confidential: Yes Contains PII: No Historical: False Vital: True				
124	Operation Services	Environmental Remediation		Permanent	Environmental
	Requirements for records documenting contamination of property, clean-up efforts implemented, and investigations and reporting of such occurrences, such as leaks, spills, and site clean-up activities.		CERCLA - Release Former Mfd. Gas Plant (FMGP) Material Safety Data Sheets Permissible Exposure Limits		
	Confidential: Yes Contains PII: No Historical: False Vital: True				
126	Operation Services	Environmental Training Records		Termination of employment + 5 Years	Environmental
			Environmental training		
	Confidential: Yes Contains PII: No Historical: False Vital: True				
296	Operation Services	Equipment Safety Inspections & Testing		Active +5 Years	Health and Safety
	Records of safety inspections and safety activities for machinery and equipment.		Change sling inspections Crane inspections		
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
145	Operation Services	Federal and State Regulatory Agency Program Documentation and Reportin	DOT Incident Report Distribution System Annual MOPSC Report Gas Transmission Integrity Management Program Documents and Reports Hazardous Liquid Annual DOT Report Liquid Pipeline Integrity Management Program Documents and Reports Replacement Program Annual MOPSC Report Transmission System Annual DOT Report	Life of Facility	Pipeline Safety Compliance
	<p>Required reports submitted to federal and state regulatory agencies, other than environmental, financial compliance, and FERC reporting, or reporting not described elsewhere. Also, gas transmission and liquid pipeline integrity management program documen</p> <p>Confidential: No Contains PII: Historical: False Vital: True</p>				
297	Operation Services	Fire Extinguisher Inspections & Testing		Active, until superseded or otherwise no longer valid.	Health and Safety
	<p>Records of inspections and testing of fire extinguishers.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>				
116	Engineering & Gas Operations	Gas Main Testing	Testing of Gas Mains Pressure Tests	Life of Facility	Construction Engineering
	<p>Form documenting the completion of pressure testing the gas mains. GIS also issues a newer version including the WO drawing for recording pressure test results.</p> <p>Confidential: No Contains PII: Historical: False Vital: True</p>				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
302	Operation Services	Health & Safety Plans, Policies, & Procedures		Active +7 Years	Health and Safety
	<p>Policies, programs, and plans for health and safety matters and contingencies, such as hazard communications programs, health and safety compliance programs, permit programs, and emergency response plans.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				
298	Operation Services	Hot Work Permits		Current	Health and Safety
	<p>Hot work permits.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				
306	Engineering & Gas Operations	LNG Plant Operations		6 Years	LNG
	<p>LNG records and reports of gas distribution, including operating logs; volume, pressure, and other measurements; and service interruption records.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				
173	Engineering & Gas Operations	Laclede Pipeline Records		Life of Facility + 6 Years	Plants & Stations
	<p>Records related to the upkeep and administration of The Laclede Pipeline.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p> <p>Inspection and Maintenance interstate pipeline that carries liquid propane and sometimes butane between Hartford and ESTL/high pressure up to 680 psi; Hazardous V ___ P__ L___.            J.U.L.I.E. requests            MO One Call requests            Pipeline Overpressure Protection Test Record            Pipeline Pigging Logs</p>				



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
252	Operation Services	Land Agreements	Easements - Land Agreements Leases - Land Agreements Permits - Land Agreements	Permanent	Right of Way
	Records related to Right of Way Land Agreements.				
	Confidential: No Contains PII: Historical: False Vital: True				
137	Operation Services	Leak Classification and Surveys - Transmission Lines	Leak Surveys Main Frame Leak Control Records Maximo Leak Tracking Records Right of Way Patrols SQL Leak Management Records	Life of Facility	Pipeline Safety Compliance
	Records generated from transmission line leaks discovered, leakage surveys, patrols, and inspections.				
	Confidential: No Contains PII: Historical: False Vital: True				
138	Operation Services	Leak Classification, Surveys, and inspections - Non-Transmission	Atmospheric Corrosion Inspection on inside and outside meters Feeder Line Right of Way Patrol Records Large Commercial/Industrial Customer Notifications Leak Response Dispatch Logs (MOW) Main Frame Leak Control Records Maximo Leak Tracking Records Mobile and Walking Main Leak Survey Records Non-Propane Facility Inspections Rectifier Inspections Report of Street Leaks F712 SQL Leak Management Records SSI Service Line Leak Survey for walking packets and outside ACI Systematic Survey Valve and CP Test Station Inspections Walking Service Line Leak Surveys (includes buried fuel run surveys) Yard Line Leak Surveys	6 Years	Pipeline Safety Compliance
	For feeder lines, mains, and service lines, records pertaining to original leak reports, leak investigation and classification, leakage surveys and line patrols. Also, for yard lines and buried fuel lines, records pertaining to leakage surveys and notifications required by (13)(M). Additionally, valve inspection records pertaining to requirements of (13)(V).				
	Confidential: No Contains PII: Historical: False Vital: True				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
146	Operation Services	Leak Reporting - Leak Summary Reports	<p>Leak summary administrative reports generated for various types of leaks to all lines and facilities for various reasons, including tracking, leak by type, status and other.</p> <p>Confidential: No Contains PII: Historical: True Vital: False</p>	<p>Building Inspection Form Class N Recheck Status Report Closed Leak Report Confined Space Tracking Spreadsheet Copper Leak Inventory Report Facility Inspection Leaking Crossing Summary Leak Repair Tracking Spreadsheet Leak by Cause Report Leak by Reporting Source Report Leaks in Block Exceed 10 Report Logged Leaks By Reporting Source Report Maximo Reports in Development for Monthly Leak Inventory and Statistics Report Monthly Class 3 Reinspect: Central District Report Monthly Class 3 Reinspect: Other Districts Report Monthly Leak Inventory &amp; Statistics Report Multiple Leaks By Address Report Pending Leaks By Reporting Source Report Pending Leaks By Year Report Reinspection Compliance Report Reports Not Generated After July 2013</p>	No Longer Than 3 Years	Pipeline Safety Compliance
315	Operation Services	Manufacture, Use, & Storage of Chemical or Fuel Products/Ingredients	<p>Records documenting the manufacture, use, and storage of hazardous chemicals, including reports required by EPCRA and TSCA. For use and storage of PCBs, see RRS 120.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>	Annual EPCRA Tier II submissions	5 Years	Environmental

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
153	Operation Services	Medical Records - Health, Safety & Environmental		Termination + 40 Years	Environmental
	Employee medical records related to safety generated and maintained in compliance with labor, OSHA, health and environmental regulations.				
	Confidential: Yes Contains PII: Yes Historical: False Vital: True				
88	Measurement	Meter Shop		6 Years	Meter Shop
	Records and reports related to the administration of the Meter Shop and meter locations.		Condemned Meter Report Employee Productivity Reports Meter Reports Monthly Burden Report Painted Meter Report Purchase Orders Reason Code Reports Route Sheets Sample Meter Reports Time Sheets Transportation System		
	Confidential: No Contains PII: Historical: False Vital: False				
89	Measurement	Meter and AMR Maintenance and Calibration Records		Life of Facility + 6 Years	Meter Shop
	Records related to the maintenance, calibration testing, and routine servicing of meters. Includes calibration test results and test device records.		668/1583 Report ACI Checks Battery Change Report Electronic Instr Issues Report F1051: Dray Bill Report F1583 CIS (from Enchilada) - Report 040511 F839 from enchilada (Main db) Report Instrument Install/Remove Report Commercial Sales Report Production Reports Report Systematic Meter Test for Fieldman Report Systematic Meter Test for Fitters Report		
	Confidential: No Contains PII: Historical: False Vital: True				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
130	Engineering & Gas Operations	MoPSC Low Pressure Regulator Waiver	Low Pressure Over-Pressurization Study	Life of Facility	GIS and System Planning
	Studies in compliance with the MoPSC low pressure regulator waiver.				
	Confidential: No Contains PII: Historical: False Vital: True				
132	Engineering & Gas Operations	MoPSC Reports and Studies	Capacity Study Travel Stops	7 Years	Pipeline Asset Management
	Reports and studies required by MoPSC.				
	Confidential: No Contains PII: Historical: False Vital: False				
143	Engineering & Gas Operations	Monthly Status and Reports - Misc.	Building Survey Summary Missouri One Call Request for Locate Service Line Abandonment Cost Agreement (SLACA)	6 Years	Pipeline Asset Management, Pipeline Safety Compliance
	Monthly reports to document the status of various Pipeline Safety activities.				
	Confidential: No Contains PII: Historical: False Vital: False				
142	Operation Services	Monthly Status and Summary Reports - Valve Inspections	ME Monthly Report Valve Inspection Overdue Status Report Valve Inspection Status Summary Valve Status Report	3 Years	Pipeline Safety Compliance
	Monthly administrative reports to document the status of valve inspections.				
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
300	Operation Services	Noise Exposure Measurements		Term +25 Months	Health and Safety
	Records of noise measurement in the work environment.				
	Confidential: No Contains PII: Historical: False Vital: False				
149	Operation Services	OQ Records of Outside Contractors		Active Contractors + 6 Years	Operations Training
	Welder qualifications Logs Procedures				
	Confidential: No Contains PII: Historical: False Vital: False				
285	Operation Services	Oil and Gas Leases		Current +1	Right of Way
	Annual Mailing				
	Annual Certificate of Ownership				
	Confidential: No Contains PII: Historical: False Vital: False				
118	Operation Services	Paving and Contractor Services		Completion + 6 Years	Right of Way
	Documentation related to paving, and payments of outside contractor services.				
	Easement Request Engineering Services Invoices Paving Contractor Invoices ROW Paving Database Various Queries ROW Paving Permit Applications				
	Confidential: No Contains PII: Historical: False Vital: False				
175	Engineering & Gas Operations	Plants & Stations Reports		6 Years	Plants & Stations
	Residual propane stock.				
	Monthly Meter Readings Company Use meters, heat, boilers Residual Propane Stock inventory and inspection of tanks at various locations providing to the public				
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
299	Operation Services	Process Safety Management		Life of Process +5 Years	Health and Safety
	<p>Process safety management records for highly hazardous materials, including process safety hazard analyses, updates, and revalidations.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				
301	Operation Services	Process Safety Management Compliance Audits		Retain 2 most recent Audits	Health and Safety
	<p>Compliance Audits.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>				
113	Engineering & Gas Operations	Project Estimates		Completion of Project + 6 Years	Construction Engineering
	<p>Records related to requests for cost estimates for commercial relocation of gas service lines, new business, non-standard service and relays.</p> <p>Confidential: No            Contains PII:            Historical: False            Vital: False</p>		<p>AutoCAD Drawings            C&amp;M Service Abandonment Completion Report            CU Library Excel Spreadsheet            Commercial Service Relocation Estimate            Customer Load Analysis            Detailed Cost Estimate GIS As-built Checklist            GIS Work Order Drawings            New Business Services Cost Estimate            Project Conflict Letter            Project Design Redline Checklist            ROW Service Release Report            Relay-Relocation Service Cost Estimate - City            Relay-Relocation Service Cost Estimate - County</p>		

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
119	Operation Services	Railroad Work Permits		Permanent	Right of Way
	Permits for work in railroad easement and other easement documents.		ROW Railroad Permit Applications Secured Easement Documents		
	Confidential: No Contains PII: Historical: False Vital: False				
128	Operation Services	Record of Asbestos in Owned Facilities		Life of Plant + 6 Years	Environmental
	Building and facility owners retain required records concerning the presence, location, and quantity of asbestos containing material (ACM) and presumed asbestos containing material (PACM).		Asbestos Information (Correspondence, disposal, exposure, inventory, plans, location inventory, abatement, analytical data, training/certification)		
	Confidential: Yes Contains PII: No Historical: False Vital: True				
117	Engineering & Gas Operations	Records of asset installation, GIS, Maximo and Main Pressure tests		Life of Facility + 6 Years	Construction Services GIS Pipeline Asset Management Pipeline Safety Compliance
	Records and maps for accounting and asset management purposes. Digital Pressure Tests are stored in Maximo. Hardcopy pressure tests (transmission only) are stored by Pipeline Safety & Compliance.		As-builts Close-out sheets (pipe installed by project) Estimated sheets (pipe installed footage by month) GIS As-built Field Note PDFs GIS Asset Record GIS As-built photos Field Books, Project folders / binders and construction packets Main Pressure Test Sheets System maps, drawings, intersection sketches Maximo asset records Service Cards, Service Line Records, Service Line books		
	Confidential: No Contains PII: Historical: False Vital: True				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
114	Engineering & Gas Operations	Residential Service Relocation		Completion + 6 Years	Construction Engineering ASK BUS DEV
	Documents and data bases related to the relocation and service relationship in residential service.  Confidential: No Contains PII: Historical: False Vital: False		New Service Residential Customer Agreement Letter Residential Service Relocation Estimate Service Relocation Customer Agreement Letter		
314	Operation Services	Safety Data Sheets & Workplace Chemical Lists		Retain while Active	Health & Safety
	Safety Data Sheets (formerly MSDS) and inventories or lists of hazardous chemicals present in the workplace.  Confidential: No Contains PII: Historical: False Vital: False				
152	Operation Services	Safety Reports and Logs		6 Years	Health and Safety
	Records generated and maintained in compliance for safety related matters.  Confidential: No Contains PII: Historical: False Vital: True		Breathing Air Inspection Log Employee Complaint Filings OSHA 300 & 300A OSHA Citation Respiratory Clearance Notice Safety Audits Safety Meeting Attendance Sheet		
135	Engineering & Gas Operations	Service Line Tracking		2 Years	Pipeline Asset Management
	Reports and scorecards to track the work performed on services (repair, replacement, testing, etc.)  Confidential: No Contains PII: Historical: False Vital: False		EFV Returned to District Log Spreadsheet ME 610 Status Tracking List ME 610 Tracking List ME Report of Contractor Time Service Abandonment Tracking Report		



## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
131	Operation Services	Third Party Damage Records		Current +5	Damage Prevention
		Records related to report of damages to Spire property by third parties.	Report of Damages to Spire Property		
		Confidential: No Contains PII: Historical: False Vital: False			
148	Operation Services	Training Records (Employees)		Termination of Employment + 5 Years	Operations Training
		Records documenting employee training in Operator Qualification, OSHA and other mandatory and optional training.	Completed OQ/OSHA training records for the Instrumentation & Control Department Completed OQ/OSHA training records for the Plants & Stations Department Completed OQ/OSHA training records for the System Control Department Completed OQ/OSHA training records for the Transportation Department Completed OQ/OSHA training records for the Underground Storage Department Hardcopy OQ records for Company employees from the C&M Dept. Hardcopy OQ records for Company employees from the SAID Dept. Training Program Material Training System (Micro Soft Office Access Form) for the tracking of OQ /OSHA and misc. employees training.		
		Confidential: Yes Contains PII: Yes Historical: False Vital: True			
147	Operation Services	Training Records (Non-employees)		Active + 5 Years	Operations Training
		Training records for non-employees, such as fire, police and other public safety agencies.	Collection Training Completed training records to area fire departments, police and other public safety agencies Mailing records to area fire and police departments. i.e. Training offered for nat. gas emergencies, C.O. response, propane emergencies and extinguisher training. Roster Sheets for Fire Department Training Training Program Material		
		Confidential: Yes Contains PII: Yes Historical: False Vital: True			

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
167	Engineering & Gas Operations	Various Reports and Log Sheets	Gasoline & Diesel Usage Report Monthly Facilities Report TF/SF Meter Usage Report Vent Gas & Methanol Log Sheets	6 Years	Underground Storage
	Records related to meter, gas and diesel usage and log sheets.				
	Confidential: No Contains PII: Historical: False Vital: True				
309	Operations Support	Dispatch Reports	Appointment Attainment Reports Drill Down Report Employee Attendance Spreadsheets Job aides and training documents Leak Response Reports Leak Logs/Leak Response times	Destroy when no longer relevant.	Dispatch
	Reports relating to Dispatch.				
	Confidential: No Contains PII: Historical: False Vital: False				
82	Operations Support	Operations Reports	Monthly Forecasts - Main Forecast New Service Forecast and Renewed Service Forecast Nextel Invoices - Cell Phone Relocation Forecast SAID - Revenue Report SAID - Service Revenue Analysis SAID Reports - Jobs and Hours Report Upgrade Reports	6 Years	Operations Controller
	Forecasts and reports for operational departments. Tracking of union upgrade to management positions in accordance with the Collective Bargaining Agreement.				
	Confidential: No Contains PII: Historical: False Vital: False				
310	Operations Support	Workload Planning	Employee Vacation Calendar Job aides and training documents Knowledge Base for Work Processes & Procedures	Destroy when no longer relevant.	Workload Planning
	Documents used for workload planning.				
	Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
11	<b>Records &amp; Information Management</b>	<b>Records Information Management Administration</b>		<b>Active + 7 Years</b>	<b>Records Manager</b>
	Records related to the establishment and maintenance of the RIM program.  Confidential: No Contains PII: Historical: False Vital: True		Authorized Key Holders for Shred Bins Authorized Users for Offsite Storage Destruction Authorizations Destruction Certifications Implementation Roadmap Legal Group Index Project Plan Record Retention Schedule Records Indices Training		
324	<b>Regulatory</b>	<b>Regulatory Orders</b>		<b>Active + 6 Years</b>	<b>Regulatory</b>
	Records of formal orders of regulatory commissions served upon Spire companies.  Confidential: No Contains PII: Historical: False Vital: True				
327	<b>Regulatory</b>	<b>Regulatory Plant Reports</b>		<b>Indefinite</b>	<b>Regulatory</b>
	Plant related regulatory reports.  Confidential: No Contains PII: Historical: False Vital: True				
240	<b>Regulatory</b>	<b>Regulatory administrative actions and required reporting</b>		<b>Permanent</b>	<b>Tariff and Rate Administration</b>
	Records and documents related to state (PSC) and federal (FERC) related matters and actions.  Confidential: Yes Contains PII: No Historical: False Vital: True		Data requests submitted to others in various rate and tariff proceedings GSIP Monitoring Report Rate design, gas supply and tariff related data request responses in Company rate cases Testimony in various rate and tariff proceedings		

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
154	Risk Management	Crisis Management	<p>Documents and records related to planning, implementation and test drills for disaster recovery, business continuity, and crisis management.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	<p>After-action reports Chemical Accident Prevention Response Exercises Drill records Test records Written Department Plan</p>	<p>Active + 7 Years</p> <p>Crisis Management</p>
18	Risk Management	Enterprise Risk Management	<p>Records created, managed and/or submitted to internal customers related to the analysis of risk at various levels of the organization.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>10K Risk Factor Disclosure Benchmarking Business Unit/Functional Risk Assessments Dashboards (presented to the RMC) Entity Risk Assessments and Reports RMC Minutes Risk Assessment Reports Risk Management Committee (RMC) Charter</p>	<p>7 Years</p> <p>Enterprise Risk Management</p>
320	Security	Emergency Notifications	<p>Records related to emergency, threat or update notifications received from local and federal government agencies.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>Updates to TSA Pipeline Guidelines Notifications from State Emergency Responders Notifications from FBI, TSA, DHS, NTAS</p>	<p>3 Years</p> <p>Security</p>
307	Security	Facility Access Badges	<p>Records related to the facility access badges. This includes employee photo and badge information. Note: Retain photos until superseded.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Employee badge Employee badge photo Vendor / temp badge</p>	<p>Term of Employee/Vendor</p> <p>Security</p>

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
264	Security	Facility Access Logs	<p>Records created for access to company facilities. This includes requests for building access and electronic access logs. Note: Retain photos until superseded</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: False</p>	<p>Visitor Logs Sign-in / sign-out sheets Computer system access log Access permission requests</p>	6 Years	Security
318	Security	Facility Security Compliance	<p>Compliance documentation regarding facility security (including records of security training; security drills and exercises; incidents and breaches; security equipment maintenance, calibration, and testing; and security threats and responses) and requirements for security measures records of natural gas transmission and distribution pipeline systems, hazardous liquid transmission pipeline systems, and liquefied natural gas facility operators (site specific measures, training, security drill or exercise reports, and security testing and audits).</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>		3 Years	Security
317	Security	Facility Security Plans	<p>Assessment and security planning records submitted to the Homeland Security Department (such as Top-Screens, Security Vulnerability Assessments, Site Security Plans, and all related correspondence with the Department) and requirements for security planning records of natural gas transmission and distribution pipeline systems, hazardous liquid transmission pipeline systems, and liquefied natural gas facility operators (including records of corporate security plans, criticality assessments, and incident response plans). Must be protected in accordance with 49 CFR Parts 15 and 1520.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: True</p>	<p>Corporate Security Plan Criticality assessments Training records Security drill or exercise reports Incident response plans Security testing and audits</p>	Active +6 Years	Security

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
25	Security	Security Camera Video		30 days	Security
	Security camera videotapes.  Confidential: No Contains PII: Historical: False Vital: False				
24	Security	Security Incidents and Investigations		Close of Case + 6 Years	Security
	Records related to security incidents and investigations involving or related to Company employees or property. Excludes investigations that lead to litigation or investigations related to employee misconduct or alleged harassment.  Confidential: Yes Contains PII: Yes Historical: False Vital: False				
	Investigation Files Investigation Photographs Non-Violent Crime Investigations Property Crime Investigations				
319	Security	Security Training and Event Materials		Superseded + 7 Years	Security
	Records related to Security trainings and events. This includes presentation materials, attendee list, exercises, POST credit hours, etc.				
	Confidential: No Contains PII: Historical: False Vital: False				
	Table Top Exercise CBT First Responders Training Awareness Briefings				
156	Security	Time Keeping Records		7 Years	Service and Installation Department
	Records related to employee work schedule and independent contractor security guard payroll hours.				
	Confidential: No Contains PII: Historical: False Vital: False				
	Payroll hours recorded for third party security contractors Work schedules				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
33	Strategic Planning	Acquisition and Business Development - Unsuccessful Deals	Bids Financial Analyses Marketing Analyses Proposals	Abandonment of Opportunity / Project + 2 Years	Strategy & Corporate Development
	Records related to potential acquisitions that were abandon/unsuccessful or commercial opportunities/transactions that were not consummated (ie unsuccessful deals).				
	Confidential: Yes Contains PII: No Historical: False Vital: False				
221	Strategic Planning	Integration Planning	Contracts Master planning document for individual integration Transition services agreements	10 Years	Integration
	Documents and records created and managed as part of the integration process related to the finance, marketing and operational functions of the acquired company and Company.				
	Confidential: No Contains PII: Historical: False Vital: False				
35	Strategic Planning	Merger and Acquisitions	Capital/Development Budgets Confidential Information Memorandum Financials Internally Developed Workpapers, Analysis, Models and Write-ups/Presentations M&A Assessments and Valuations Maps, etc. from the Seller Strategies/Plans	Life of Deal + 10 Years	Strategy & Corporate Development
	Documents supporting the evaluation, analysis, and due diligence of possible merger and/or acquisition targets.				
	Confidential: Yes Contains PII: No Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper	
220	Strategic Planning	New market analysis and development	<p>Records related to idea generation for products, the actual creation of products, and the training and marketing efforts that will accompany its introduction. Includes conceptual designs, marketing plans, and testing data.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>Competitor Analysis Conceptual Designs Design Research Design Specifications Development Redesigns Financing information and documents Geographic Plans and Analysis Marketing Plans New Product Plans Performance Dashboards Product Design Reviews Product Design Specifications Product Testing Data Projections Site Evaluations Tax information and documents</p>	Active + 6 Years	Strategy & Corporate Development
34	Strategic Planning	Projects	<p>Documents related to various projects as assigned in different departments.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>Agendas Continuous Improvement Presentations Project Analysis Project Budgets Project Tracking and Logs Project Workpapers Status Reports</p>	Active + 5 Years	Strategy & Corporate Development
36	Strategic Planning	Strategic and Business Planning	<p>Records related to the strategic and business plans of the Company and its business units.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	<p>Business Plan Records Long-Range Planning Reports Scorecard and Metrics Tracking Scorecards Strategic Plan Records</p>	Superseded + 10 Years	Strategy & Corporate Development



## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
276	Supply Chain	Banking - General (Duplicate)	<p>Account Reconciliations BAI Files - Bank files for Comerica, Commerce, US Bank Statements (electronic bank statements used to import activity into treasury workstations) Bank Account and Subsidiary Bank Statements Bank Reconciliations and Workpapers Banking Wire Transfers (log sheets related to wire and ACH transfer forms) Borrowing and Investment Strategies and Analysis Cancelled Checks Cash Balances and Forecasting Cash Management and Investments Charitable Trust Canceled Checks/Stubs of LG Charitable Contributions Check Registers Check Registers for Treasury Account Special and the Charitable Trust Deposits, Withdrawals, Written Checks. Consolidated Cash Report Detail Consolidated Cash Reports Deposit Slips Float trends Insider Trading Requests Monthly Bank Statements Sundry Cash Reconciliation Trust Statements - Pension, Rabbi, Rabbi Welfare, SERP, VEBAs, etc. Wire Transfers</p>	7 Years	<p><b>Financial Reporting Treasurer &amp; Assistant Secretary Supply Chain (Check Deposits and Canceled Checks)</b></p>
	<p>Records related to banking activities not covered elsewhere. These records establish the terms and conditions for banking activities, correspondence about the accounts, and analyses and audits of the accounts.</p> <p>Confidential: No Contains PII: Historical: False Vital: False</p>				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
253	Supply Chain	Contractor Compliance Records - Supply Chain	Contractor Safety Contractor Time Sheets Contractor drug testing compliance affidavits Diversity Information - Suppliers Insurance Information - Suppliers	Termination of Contract + 6 Years	Operations Training (non-OoR) Safety, Environmental & Crisis Management
	Records documenting compliance with various governmental compliance requirements for contractors.  Confidential: No Contains PII: Historical: False Vital: False				
303	Supply Chain	Non-Plant Procurement Records		Complete +6	Supply Chain
	Records documenting the procurement of non plant services, supplies, and materials, including requisitions, requests for proposals or bids, and responses, acceptances, and purchase orders.  Confidential: No Contains PII: Historical: False Vital: False				
76	Supply Chain	Storeroom (Utility Plant)	Bills of Lading Material Receipts Move Order/Material Requisitions (issues, returns and adjustments for stock items) New Item Form Stock Item Return Form Stores Field Transfers	Life of Plant + 6 Years	Storeroom Services
	Records related to receipt of stock from third party vendor, requisition for goods, and movement of storeroom items (both to and from storeroom). These relate to Capital and Fixed Asset purchases for state or federal regulated entities:  Confidential: No Contains PII: Historical: False Vital: False				

# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
77	Supply Chain	Vendor/ Supplier Bids and Requisitions (Plant)	Accepted and non-accepted bids and proposals, or summaries Approved Suppliers Bid Evaluation Workpapers Bid Exception Log Bid Requests (including RFI, RFP) Core Purchasing Requisitions Item Specifications/Approved Manufacturers Purchase Orders (Standard, Blanket and Contract) iProcurement Requisitions (includes stock and non-stock)	Life of Plant+ 6 Years	Supply Chain
	Records documenting the procurement of plant related goods or services, including requisitions, requests for proposals or bids and responses (or summaries), acceptances, and purchase orders. Note: "Plant" equates to Capital or Fixed Asset purchases. "Utility" relates to state or federal regulated entities.				
	Confidential: No Contains PII: Historical: False Vital: False				
73	Tax	Sales Tax Exemptions Refunds - Customers	Refund Requests Tax Exemption Refunds Power of Attorney Memos Exemption Documentation	7 Years	Tax
	Records related to sales tax refunds.				
	Confidential: No Contains PII: Historical: False Vital: False				
68	Tax	Tax Returns - Appeals, Audits, Settlement Forms	Tax Appeals/Audits/Settlement Forms Tax Audit Research/Workpapers/Support	Current + 10 Years	Tax
	Records documenting the tax appeal, tax audit or tax settlement form including tax audit research, workpapers and related support.				
	Confidential: No Contains PII: Historical: False Vital: True				
70	Tax	Tax Returns - Corporate Franchise		7 Years	Tax
	Records that represent corporate franchise tax returns and related workpapers.				
	Confidential: Yes Contains PII: No Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
67	Tax	<b>Tax Returns - Federal and State Income</b>	<p>Records documenting the filing of corporate federal and state tax returns including related workpapers of current and former entities.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	10 Years	Tax
			<p>Amended Returns Charitable Trust Company Owned Life Insurance Policy Value Reports, Premium Invoices, Payment Authorizations Deferred Compensation Files Such As Election Forms, Benefit Calculations Dollar Help Final Income Tax Allocations Notices of Proposed Adjustments and Responses PAC (except PAC formation documents which are permanent) Real and Personal Property Tax Refund Filings Tax Depreciation Workpapers Tax Planning Tax Workpapers/Support VEBAs</p>		
69	Tax	<b>Tax Returns - Local Income</b>	<p>Records documenting the filing of corporate local tax returns including related workpapers of current and former entities.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	10 Years	Tax
			<p>Business Licenses City Earnings</p>		
71	Tax	<b>Tax Returns - Miscellaneous</b>	<p>Records that represent miscellaneous tax returns and miscellaneous tax workpapers not covered elsewhere.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	7 Years	Tax
			<p>1099 Reporting Records B-Notice Information Director Payments - 1099 Information Excise &amp; Information Gross Receipts Heavy Vehicle Use P-Card 1099 Information and Reports Sales &amp; Use Tax</p>		

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
72	Tax	Tax Returns - Supporting Documentation	Supporting documentation for tax filings and returns of current and former entities. Excludes Tax Depreciation Workpapers. See (INDEX) for Tax Depreciation Workpapers.	10 Years	Tax
	Confidential: Yes Contains PII: No Historical: False Vital: False		Correspondence with Tax Authorities		
74	Tax	Utility Plant Fixed Assets - Tax Depreciation	263FA Utility Plant Tax Depreciation Calculation Utility Plant Tax Depreciation Workpapers	Life of Plant + 25 Years	Tax
	Confidential: Yes Contains PII: No Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
59	Treasury	Banking - General	<p>Records related to banking activities not covered elsewhere. These records establish the terms and conditions for banking activities, correspondence about the accounts, and analyses and audits of the accounts.</p> <p>Confidential: Yes Contains PII: No Historical: False Vital: False</p>	7 Years	Financial Reporting Treasury Supply Chain (Check Deposits and Canceled Checks)
			<p>Account Reconciliations BAI Files - Bank files for Comerica, Commerce, US Bank Statements (electronic bank statements used to import activity into treasury workstations) Bank Account and Subsidiary Bank Statements Bank Reconciliations and Workpapers Banking Wire Transfers (log sheets related to wire and ACH transfer forms) Borrowing and Investment Strategies and Analysis Cancelled Checks Cash Balances and Forecasting Cash Management and Investments Charitable Trust Canceled Checks/Stubs of LG Charitable Contributions Check Registers Check Registers for Treasury Account Special and the Charitable Trust Deposits, Withdrawals, Written Checks. Consolidated Cash Report Detail Consolidated Cash Reports Deposit Slips Float trends Insider Trading Requests Monthly Bank Statements Sundry Cash Reconciliation Trust Statements - Pension, Rabbi, Rabbi Welfare, SERP, VEBAs, etc. Wire Transfers</p>		
37	Treasury	Commercial Paper and Retiree Fund	<p>Documents related to commercial papers and management of employee retirement funds.</p> <p>Confidential: Yes Contains PII: Yes Historical: False Vital: True</p>	7 Years	Treasury
			<p>Commercial Paper Confirmations Pension Fund Trust (reimbursement request for LGC and MONAT, pension and Retiree medical claims) Retiree Medical Claims Worksheets</p>		

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
255	Treasury	Deposit Slips - Cashiers & Mailings	Deposit Slips	3 Years	Meter to Cash - Billing Treasury
	Confidential: Yes Contains PII: No Historical: False Vital: False				
40	Treasury	Financial Reporting - Internal	Credit Risk Management: customer credit files, LER and C&I utility accounts & documentation of credit decisions Current Hedge Positions Energy1 - Ties to current hedge positions and broker's statements LG Hedge Scenario S&P Liquidity Report	6 Years	Treasury
	Records and information on liquidity, hedging, AR/AP and rating agencies and margins. Confidential: Yes Contains PII: Yes Historical: False Vital: False				
39	Treasury	Financial Reporting - Workpapers	10K & 10Q Files Account agreements to FC stone Charitable Trust Statements Commodity Trading Company Owned Life Insurance Policy Value Reports Credit Card Activities Treasury 1 Folder (database logging checks, coding expenses, vendors) Daily Cash Report Worksheets Dividend Reinvestments (DRIP) Worksheet Executive Life Insurance Policies and Payments Long-term Debt Documentation PSC Order - Worksheets related to financing authority Prime Rate Memo Sinking Funds - Preferred Stock	Current + 7 years	Treasury
	Various worksheets, reports and databases that track commercial papers, cash management, expenses and financial and business forecasting. Confidential: Yes Contains PII: Yes Historical: False Vital: False				

## Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
328	Treasury	Financing Records		Current + 7 Years	Treasury
	Records of equity or debt financing. Confidential: No Contains PII: Historical: False Vital: False		Registered bond and debenture ledgers Records of bond and debenture certificates issued Trust indentures, loan agreements, or other agreements securing debt securities issued		
329	Information Technology	ITS Product licenses and maintenance agreements		Life of Software + 6 Years	Information Technology
	Product licenses and maintenance agreements Confidential: No Contains PII: Historical: False Vital: False		Product licenses Maintenance agreements		
330	Legal	Government Investigations & Audits		Complete + 7 Years	Legal
	Records of governmental investigations, hearings, and audits not addressed elsewhere. Confidential: Yes Contains PII: No Historical: False Vital: False		Records relevant to pending complaint procedures and government proceedings		
331	Operation Services	Manufacture, Use, & Storage of Chemical or Fuel Products/Ingredients		5 Years	Environmental
	Records documenting the manufacture, use, and storage of hazardous chemicals, including reports required by EPCRA and TSCA. Confidential: Contains PII: Historical: False Vital: False		Emergency Planning and Community Right-to-Know Act (EPCRA) Tier I and Tier II inventory information Material Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) for a hazardous chemical		



# Spire Records Retention Schedule Report

RRS ID#	Functional Area	Record Category	Examples	Retention	Record Keeper
332	Treasury	Investment Management		Life of Investment + 7 Years	Treasury
	Records of investments for Spire entities or for pension and retirement funds.				
	Confidential: Contains PII: Historical: False Vital: False				
333	Customer Experience	Bad Debt Collection Reports		Completion + 3 Years	Credit & Collection
	Reports documenting bad debt reserves, collections, final bill, and uncollectibles. These are generated as support for budgeting and administrative purposes.		Bad Debt Reserve Reports Collection Records Final Bill Report Paid Collectibles Index Files Uncollectible Purge Reports		
	Confidential: Contains PII: Historical: False Vital: False				
334	Operation Services	Pipeline Standards & Procedures (OPM)		Permanent	Standards & Procedures
	Records of gas utility and pipeline operator safety programs and procedures, such as operations, maintenance, and emergency response programs, excavation damage prevention programs, and continuing public education programs.		Pipeline conversion to service Welding, Joining other than by welding Emergency response Operations & maintenance Damage prevention Corrosion		
	Confidential: Contains PII: Historical: False Vital: True				