

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

Symmetry Energy Solutions, LLC,)	
Constellation NewEnergy-Gas Division,)	
LLC, and Clearwater Enterprises, LLC)	
)	
Complainants,)	
)	
v.)	Case Nos. GC-2021-0316, GC-2021-0315,
)	and GC-2021-0353
)	
Spire Missouri, Inc. and its operating unit)	
Spire Missouri West,)	
)	
Respondents.)	

**SYMMETRY ENERGY SOLUTIONS, LLC’S, CONSTELLATION NEWENERGY-GAS
DIVISION, LLC’S, CLEARWATER ENTERPRISES, LLC’S, AND SPIRE MISSOURI,
INC. AND ITS OPERATING UNIT SPIRE MISSOURI WEST’S JOINT MOTION TO
COORDINATE DISCOVERY AND MOTION FOR EXPEDITED TREATMENT**

Symmetry Energy Solutions, LLC (“Symmetry”), Constellation NewEnergy-Gas Division, LLC (“CNEG”), Clearwater Enterprises, LLC (“Clearwater”) (together, “Complainants”), and Spire Missouri, Inc. and its operating unit Spire Missouri West (together, “Respondents,” and together with Complainants, the “Parties”), by and through undersigned counsel, in support of their Joint Motion to Coordinate Discovery state as follows:

1. Complainants filed a joint motion on August 27, 2021, asking the Commission to consolidate their complaint cases, to make GC-2021-0316 the lead case, and to establish a joint procedural schedule for the three complaints.

2. On September 1, 2021, the Commission issued its "Order Setting a Joint Procedural Schedule, Including a Joint Hearing," in which it recognized, "Each of these three complaints involve common questions of law and fact and make a joint hearing of the complaints appropriate." The Commission declined "full consolidation" noting the

Commission may need to issue "distinct orders" given that the "complainants are themselves distinct corporate entities facing distinct financial penalties."

3. To facilitate efficient use of documents and data requests in these three cases, the Parties request an order that documents disclosed and written discovery (including deposition transcripts) provided in any one case be disclosed or provided in all three cases, without further request from the Parties, and subject to the Protective Order (Motion for Protective Order filed herewith).

4. This order does not affect or impair the Parties' rights to take depositions in their respective cases or restrict the time available for depositions. Notwithstanding, the Parties will provide notice of all depositions to all Parties in the three cases and commit to good faith efforts to coordinate depositions efficiently.

MOTION FOR EXPEDITED TREATMENT

Symmetry, Constellation and Clearwater have filed Notices of Deposition for November 30, 2021 at 9:00 a.m. Pursuant to 20 CSR 4240-2.080(14), the Parties request that the Commission expeditiously grant this Motion to Coordinate Discovery by November 29, 2021. By doing so, the Commission will avoid the harm that would be caused by the inefficiencies associated with all Parties not being able to attend the depositions. There will be no negative effects from the granting of this Motion. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, the Parties respectfully request an order of the Commission, granting this Motion and the Motion for Protective order filed herewith expeditiously, and such other and further relief as is just and proper under the circumstances.

Respectfully Submitted,

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of November 2021, a copy of the foregoing **Motion** has been served on all parties on the official service list for this matter via filing in the Commission's EFIS system and/or email.

/s/ Stephanie Bell

Stephanie S. Bell