

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

In the Matter of Staff’s Investigation of)
Spire STL Pipeline’s Application at)
FERC for a Temporary Certificate to)
Operate)
File No. GO-2022-0022

**SPIRE MISSOURI INC’S
MARCH 2022 REPORT ON CONTINGENCY PLANNING**

Comes Now, Spire Missouri Inc (“Spire Missouri” or “Company”) by and through counsel and files this March 2022 Report on Contingency Planning and in support thereof states the following:

1. On July 28, 2021, the Missouri Public Service Commission (“Commission”) issued an *Order Opening Investigation* wherein the Commission orders its Staff to undertake an investigation regarding Spire STL Pipeline’s application to the FERC for authority to continue operating the Spire STL Pipeline to provide natural gas to the St. Louis area. On August 16, 2021, the Staff filed its Investigative Report, confidential and public, with the Commission.
2. On September 1, 2021, the Commission issued an *Order Regarding Further Investigation* (the Order) which ordered Spire Missouri to periodically report on its current contingency plans, ongoing contingency plan development, and conditions affecting its ability to provide adequate gas supply and pressure to all customers for the winters of 2021-2022, 2022-2023, and 2023-2024. The Commission ordered Spire Missouri to file such reports monthly, by the 15th of each month, for the period of November 2021 through March 2022. Thereafter, such reports shall be filed at the end of each quarter. Spire Missouri shall provide additional reports when conditions occur operationally or related to Spire STL’s

court and FERC cases that prompt Spire Missouri to take action related to its operations or its transportation and storage capacity on pipelines.

3. Spire Missouri files the attached Report on Spire Missouri's Contingency Planning, March 2022, marked Exhibit A to this pleading. This filing complies with the Commission's Order issued on September 1, 2021.
4. This Report on Spire Missouri's Contingency Planning includes that Spire Missouri continues to monitor and work on alternative supply since the last report, including evaluating the continued uncertainty surrounding the long-term operation of Spire STL Pipeline.

Wherefore, Spire Missouri respectfully submits this Report to comply with the Commission's Order issued September 1, 2021 for the Commission's review and consideration.

Respectfully submitted,

/s/ Matt Aplington

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ATTORNEYS FOR SPIRE MISSOURI INC

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Report was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 14th day of March 2022 by e-mail.

/s/Lew Keathley



Spire Missouri Contingency Planning

March 15, 2022

Overview

In compliance with the September 1, 2021 Order Regarding Further Investigation in this matter, Spire Missouri submits this fourth report on its current contingency plans, ongoing contingency plan development, outreach and coordination, and alternative supply efforts.

Contingency planning update

Given the issuance of a temporary emergency certificate by FERC on December 3, 2021, Spire Missouri has halted its contingency planning efforts and has been focusing on planning for future winters given the continued uncertainty surrounding the long-term operation of Spire STL Pipeline.

Regardless of any future outcome, we will continue to be prepared to maximize the delivery of natural gas, protect lives and property, and care for impacted customers and communities.

Given that the contingency plan has been developed, and outreach and coordination has halted for the time being, our focus will remain on alternative gas supply planning.

Alternate supply update

Spire Missouri has continued to monitor and work on alternative supply since the last report. Specifically, Spire Missouri is continuing to evaluate potential long-term options for gas supply, should Spire STL Pipeline be shut down at some point in the future.

However, it is important to note that any such efforts will take a significant amount of time to complete and have in place. On February 18, 2022, FERC issued two new policy statements: a Certificate Policy Statement (replacing the 1999 Certificate Policy Statement) and an Interim Policy Statement regarding greenhouse gas emissions. These new policy statements are broadly viewed as increasing the regulatory hurdles associated with certification of any new pipeline projects.