

**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 24th day of January, 2022, to:

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