

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

In the Matter of Spire Missouri, Inc.                    )  
d/b/a Spire's Request for Authority to                )  
Implement a General Rate Increase                 )  
for Natural Gas Service Provided in  
the Company's Missouri Service  
Areas

**Case No. GR-2022-0179**

**Statement of Discovery Concern**

COMES NOW Staff of the Missouri Public Service Commission (Staff) and identifies two areas of concern for discovery in anticipation of the Discovery Conference scheduled for September 28, 2022.

1. Staff believes the following concerns will likely be addressed without need for a discovery conference. However, a statement of concern is being filed in an abundance of caution. Staff will file an update before September 28, if these issues are resolved.

2. Staff is concerned that Spire's response to Staff DR 341 is currently incomplete, in that it contains broken links to a file not provided, and based on responses to other DRs Spire's current response appears to be missing some information.

3. Staff is concerned that Spire's response to Staff DR 76.2 is incomplete, in that Staff DR 76.2 asked for an explanation of *all* differences between the spreadsheets provided in response to DR 76 and DR 76.1, but Spire's response merely states that it found "no variances between the number of bills...."

4. Staff has issued DRs 342, 343, 345, and 348 to the Office of the Public Counsel that were due September 21, but has not yet received a response.

Respectfully submitted,

/s/ Curt Stokes  
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**Counsel for Staff of the Missouri Public  
Service Commission**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 23<sup>rd</sup> day of September, 2022, to all parties and/or counsels of records.

/s/ Curt Stokes  
Curt Stokes