

**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) **Case No. GR-2022-0179**
Natural Gas Service Provided in the)
Company's Missouri Service Areas)

STATEMENT OF DISCOVERY CONCERN OR DISPUTE

COMES NOW Staff of the Missouri Public Service Commission (Staff) and states that it has a discovery dispute or concern in the above-captioned case:

1. Staff is requesting a discovery conference on the scheduled date of Wednesday, October 26, 2022, to address the potential following discovery issues. If the issues are resolved, Staff will file a statement indicating so.

2. A discovery conference may be necessary to address true-up information due on this date, October 21, 2022, for information through September 30, 2022. Because the statement of discovery concern is due the same date that true-up discovery is due, and surrebuttal and true-up testimony is due November 4, 2022, Staff is requesting a discovery conference in an abundance of caution. Spire provided some, but not all, true-up information through August 31, 2022, by September 30, 2022, pursuant to the Commission's August 16 Order Modifying the Procedural Schedule.

3. In addition, Staff has concerns with the following data requests (DRs):
- a. Spire's response to DR 332 is currently incomplete, as it lacks information responsive to subpart 9 of this DR. Staff has been in contact with Spire regarding this DR.
 - b. For DR 335, Staff raised concerns that Spire's original answer was not completely responsive as to subparts 1 and 2, particularly with

regards to records for the full time period requested. For this DR, Staff requires information covering at a minimum, the amended test year period for this rate case through September 30, 2022, and Spire should have access to records going back to Spire Missouri's acquisition in 2020.

- c. For DR 313, Spire's answer is not completely responsive as Spire's answer lacks the revenue and expense information through September 2022 broken out by facility.
- d. For DR 341 and 341.1, Spire's response is not completely responsive.
- e. For DR 397, Spire's response is not completely responsive as it lacks the capacity installed and capacity utilized data that was requested.

4. With regards to DR 295.1, Staff has been in contact regarding some additional detail responsive to DR 295.1. In raising a concern, Staff notes that Spire has been exceptionally accommodating and cooperative in providing information responsive to this DR. Staff's concern is limited to the background and timing of Spire's recording of certain costs relevant to this DR.

5. Finally, Staff is identifying the following DRs in an abundance of caution, as Spire has supplemented its responses and Staff is still reviewing to determine if Staff's concerns are resolved:

- a. For DRs 314 and 367, Staff raised concerns with Spire that Spire's original answer was not completely responsive, as Spire's response

refers to other DR responses that do not answer the questions asked. Spire supplemented its responses on October 19.

- b. For DR 334, Staff raised concerns that Spire's original answer was not completely responsive. Spire supplemented its response on October 20.

WHEREFORE, Staff respectfully submits this statement of discovery concern or dispute in anticipation of a potential discovery conference on Wednesday, October 26, 2022.

Respectfully submitted,

/s/ Curt Stokes

Curt Stokes

Chief Deputy Counsel

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**Attorney 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 21st day of October, 2022, to all parties and/or counsels of records.

/s/ Curt Stokes

Curt Stokes