

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

Constellation NewEnergy – Gas Division, LLC,)	
)	
)	
Complainant,)	
)	Case No. GC-2021-0315
v.)	
)	
Spire Missouri, Inc. d/b/a Spire,)	
)	
Respondent.)	
Symmetry Energy Solutions, LLC,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2021-0316
)	
Spire Missouri, Inc. d/b/a Spire,)	
)	
Respondent.)	
Clearwater Enterprises, LLC,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2021-0353
)	
Spire Missouri, Inc. d/b/a Spire,)	
)	
Respondent.)	

JOINT MOTION TO SUSPEND SCHEDULE

The undersigned parties unanimously and respectfully request the Commission to suspend the schedule in the above-referenced matters. In support of this unanimous joint motion, the undersigned parties state the following:

1. The Parties have reached an agreement in principle that would settle the above-styled complaint cases before the Missouri Public Service Commission, as well as, three federal lawsuits brought by Spire Missouri, Inc. against the complainants in Case No. 4:21-cv-00180-MDH, Case No. 4:21-cv-00181-MDH, and Case No. 4:21-cv-00182-MDH (these cases have been stayed pending resolution of the Commission cases). Accordingly, the parties ask that the Commission suspend the current procedural schedule, including discovery schedules, to allow the Parties time to produce and file a stipulation and agreement consistent with that agreement.

2. The Parties propose that such suspension order further direct the parties to either file such a stipulation and agreement or a status report by March 8, 2022.

3. Nothing herein precludes a party from requesting a Commission Order that would reinstitute discovery and establish an amended procedural schedule in the event the status report referenced in paragraph 2 of this Joint Motion, or any subsequent status report filed in any of the above-styled complaint cases, contains a statement by any party that settlement negotiations have reached an impasse. An impasse in any one of the above-styled complaint cases should not be construed as an impasse in any of the other above-styled complaint cases unless specifically stated.

WHEREFORE, the undersigned parties unanimously and respectfully ask the Commission to suspend the schedule in these matters as described herein.


Respectfully submitted,

<p><u>/s/ Jamie S. Myers</u></p> <p>Jamie S. Myers Deputy Counsel Missouri Bar No. 68291 P.O. Box 360 Jefferson City, Mo 65102 (573) 526-6036 (Telephone) (573) 751-9285 (Facsimile) (Email) jamie.myers@psc.mo.gov</p> <p>Curt Stokes Chief Deputy Counsel Mo. bar. No. 59836 Phone: 573-751-4227 Fax: 573-751-7431 E-mail: curtis.stokes@psc.mo.gov</p> <p>Attorneys for the Staff of the Missouri Public Service Commission</p>	<p>By: <u>/s/ Joshua Harden</u></p> <p>Joshua Harden Missouri Bar No. 57941 Collins & Jones, P.C. 1010 W. Foxwood Dr. Raymore, Missouri 64083 jharden@collinsjones.com Tel. (806) 318-9966</p> <p>Amy L. Baird (admitted pro hac vice) Texas Bar No. 24044090 abaird@jw.com Jackson Walker L.L.P. 1401 McKinney Street, Suite 1900 Houston, Texas 77010 Telephone: (713) 752-4200</p> <p>Richard A. Howell (admitted pro hac vice) Texas Bar No. 24056674 rahowell@jw.com Jackson Walker L.L.P. 1401 McKinney Street, Suite 1900 Houston, Texas 77010 Telephone: (713) 752-4200</p> <p>Attorneys for Complainant Constellation NewEnergy-Gas Division, LLC</p>
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties on this 24th day of February, 2022.

A handwritten signature in black ink, appearing to read "D. J. Long", is positioned to the right of the text.