

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

In the Matter of Spire Missouri Inc.'s d/b/a Spire)
Request for Authority to Implement a General Rate)
Increase for Natural Gas Service Provided)
In the Company's Missouri Service Areas)
Case NO. GR-2021-0108

**DISCOVERY CONFERENCE ISSUES FOR RESOLUTION AT THE MARCH 1, 2021
ON-THE-RECORD DISCOVERY CONFERENCE**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, pursuant to the Commission's February 3, 2021 Order Setting Procedural Schedule (Order), ordered paragraph 3, states that it brings before the Commission Staff Data Request 111 and related Spire responses on the matter and need for Spire to provide Staff with standard financial information pertaining to Spire Inc., the holding company and parent of Spire Missouri, Inc. Staff also intends to address the matter of Spire's general objection to the provision of Spire Inc. information requested in numerous Staff Data Requests. Staff seeks parent company information so that Staff may perform its Commission duty in analyzing the expenses and allocated costs that Spire Missouri seeks to recover from its customers in this rate case. Staff Data Requests that seek Spire Inc. information include, but are not limited to, Staff Data Request Nos. 8, 26, 36, 46, 59, 106, 120, 125, 126, 203, and 203.1. The Order provides for an on-the-record discovery conference to be held via Webex at 10:00am, March 1, 2021.

Staff points out that Spire Missouri is obligated to provide the requested Spire Inc. information under the terms of the July 9, 2001 stipulation and agreement regarding the establishment of a holding company in Case No. GM-2001-341. See State of Missouri ex rel Laclede Gas Company v. Public Service Commission of the State of Missouri, 392 SW3d 24 (Mo. App. 2012).

Staff requests leave of the Commission to accept this filing on 1 business day notice so that the Commission may weigh in on, and provide clarity to all parties, the need and requirement of Spire Missouri to disclose to Staff the information it requests from Spire Inc. in its Data Requests.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25th day of February, 2021.

/s/ Robert S. Berlin