

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

In the Matter of the Application of    )  
Spire Missouri Inc. to Change its    )  
Infrastructure System Replacement    )    File No. GO-2019-0115  
Surcharge in its Spire Missouri East )  
Service Territory                        )

In the Matter of the Application of    )  
Spire Missouri Inc. to Change its    )  
Infrastructure System Replacement    )    File No. GO-2019-0116  
Surcharge in its Spire Missouri West )  
Service Territory                        )

**PUBLIC COUNSEL DATA REQUEST NO. 1**

The Office of Public Counsel (Public Counsel) hereby presents the following Data Request to Spire Missouri East and Spire Missouri West pursuant to Commission Rule 4 CSR 240-2.090. Public Counsel asks that Spire respond to this request within two (2) calendar days of receipt as the Commission ordered. Please provide electronic responses to the following: [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) and [john.clizer@ded.mo.gov](mailto:john.clizer@ded.mo.gov). This data request is continuing in nature and requires supplemental responses as soon as further or different information is obtained that is responsive to it.

**DEFINITIONS**

As used herein, the words “document,” “documents,” or “documentation” include any original and all copies of any written, printed, typed, electronically stored, or graphic matter of any kind or nature, however produced or reproduced, now in your possession, custody or control, or in the possession, custody or control of your agents, representatives, employees of you or any and all persons acting in your behalf, including documents at any time in the possession, custody or control of such individuals or entities, or known by you to exist.

## DATA REQUEST

1. On February 26, 2019, the OCP sent Spire a data request (“DR”) on behalf of John Robinett numbered 8523 that requested “all documentation that defined how overhead is determined and charged for each project claimed as ISRS eligible.” Spire responded to that DR as follows:

The Company is unclear of how to respond to this request because the definition of “overhead” is vague. There are a variety of types of overheads, including department clearings, mechanical equipment clearings, vehicle hours, pension and group insurance, and other indirect charges etc. This request needs to be more narrowly defined in order for the Company to answer in a meaningful way.

While the OPC considers this to be an improper and untimely objection to its prior DR, the OPC will nevertheless seek to clarify its request through the issuance of this new DR so as to forgo further difficulties.

The “overhead” that the OPC is requesting is that found in the workpapers for individual projects that Spire has already supplied. By way of example, within the electronic copies of the company workpapers supplied by Spire there is a folder labeled “Individual Project Analysis.” Within this folder are subfolders labeled “January Individual Files” and “June Individual Files.” Within the folder labeled “January Individual Files” there are subfolders labeled “East” and “West.” Within the folder labeled “East” are a number of files formatted for Microsoft Excel. One such file is labeled 900974. If one opens the file labeled 900974, then one would find the information contained in the following table as well as several maps and diagrams:

13313515 - Central West End Phase 1B (Partney/Baerman)

	Scenario 1 All new pipe	Scenario 2 Utilize Existing pipe
Plastic Abandon	264	10
Steel Abandon	30	30
Cast Iron Abandon	4781	4781
Plastic Main Installed	4425	4171
Plastic Existing Main Used	2012	254
Total Service Renew	70	13
Total Service Transfer	70	74
Total Service Abandon	22	18
Total Service Uprate	20	20
Total Service Install	0	0
Total Services	112	112
Labor Cost	108,253.81	132,711.22
Material Cost	78,075.96	76,306.05
Tool Cost	54,730.56	51,474.92
Overhead Costs	295,229.21	352,613.67
<b>Total Cost</b>	<b>\$536,290</b>	<b>\$613,106</b>

Comments:

Added extra tie in holes to tie in and upgrade remainin plastic and changed over 61 services from renewals to transfer.

One of the lines of the table found in the file labeled 900974 is titled “overhead costs.” This line labeled “overhead costs” is the “overhead” to which the OPC’s DR refers.

The OPC is requesting that, for each and every “individual project analysis” for which an “overhead cost” was calculated for either Spire East or Spire West, Spire provide the following information and produce all supporting documentation regarding the same:

- (a) A breakdown of all the costs that are included in the line labeled “overhead costs;”
- (b) An explanation of how each cost item that makes up the line labeled “overhead costs” is itself calculated;
- (c) A narrative description of what measures Spire has in place to ensure all costs included in the line labeled “overhead costs” are not already being collected in base rates; and (when applicable)
- (d) An explanation via narrative response for why the line labeled “overhead costs” makes up more than fifty percent of the total cost

**HOWEVER**, given the scale of this request and the short time remaining for discovery, the OPC will accept **instead** answers to the following more general questions:

- (a) A breakdown of all costs that **may** be included in the line labeled “overhead costs” for any given “individual project analysis;”
- (b) An explanation of how each cost item that **might** make up the total in the line labeled “overhead costs” for any given “individual project analysis” would itself be calculated;
- (c) A narrative description of what measures Spire has in place to ensure that any and all costs that **might** be included in the line labeled “overhead costs” for any given “individual project analysis” are not already being collected in base rates; and
- (d) A general explanation via narrative response for why the line labeled “overhead costs” makes up more than fifty percent of the total cost for so many of its projects.

In the event that Spire chooses to answer this second set of more general questions, then the OPC further requests that Spire provide specific examples for each of its answers based on the individual project analysis file labeled 900974 (and identified above).

The OPC notes that these questions should not be answered by reference to ambiguous “accounting practices.” There should be sufficient detail within Spire’s response to permit independent third-parties to verify calculations are correct.

*Submitted March 22, 2019, by John Clizer*