



Spire Missouri Inc.
700 Market Street
St. Louis, MO 63101

September 14, 2022

John Clizer
The Office of the Public Counsel
200 Madison Street
Jefferson City, Missouri 65101

RE: Case No. GR-2022-0179. Objections to OPC Data Requests 3031, 3033, and 3041

Dear Mr. Clizer,

Spire Missouri Inc. (“Spire Missouri” or “Company”) received data requests (“DRs”) 3031, 3033, and 3041 in the above referenced case on September 9, 2022 from the Office of the Public Counsel (“OPC”). The Company timely objects to above DRs. For your convenience, the Company has set forth the DR, followed by the objection.

DR 3031: Please provide updated balances of accounts Mr. Woodard provided in Schedule AWW-S-2 in Case No. GR-2021-0108. Please provide this information for the period September 30, 2017 through September 30, 2019 and May 31, 2021 through current.

Objection: Spire Missouri objects to this data request as it is not reasonably calculated to lead to the discovery of admissible evidence. The information requested is not relevant because Schedule AWW S-2 from Case No. GR-2021-0108 was not used to support the Company’s application in this case. Nor is the period from September 30, 2017 to September 30, 2019 relevant to this case, as it is outside of the test year.

DR 3033: Please provide the monthly information for all line-items in Mr. Woodard’s Schedule AWW-D-13 for the period September 30, 2017 through December 31, 2020.

Objection: Spire Missouri objects to this data request as it is not reasonably calculated to lead to the discovery of admissible evidence in that the information requested is not relevant as it requests information that is outside of the test year in this case. Notwithstanding the foregoing objection, Spire Missouri has provided responsive information in its response to Staff data request 231.1 relating to the period of October 2018 to July 2022.

DR 3041: Please identify all regulatory deferrals other than construction work in progress (“CWIP”) that accrue financing charges based on the cost of short-term debt. Is the accrual based on the “all-in” cost (including credit facility charges) of short-term debt or just the interest rate on the short-term debt?

Objection: Spire Missouri objects to this request as vague and ambiguous. It is not clear what is meant be “regulatory deferrals,” and whether that is intended to refer to Commission-established regulatory assets, or some other class of FERC accounts.

Sincerely,



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