

OPC Data Requests and Spire Responses from Exhibit No. 200 entered into the record in GO-2019-0115 and GO-2019-0116; schedule jar-d-3 and schedule jar-d-4

8514. For each work order included in this ISRS filing, Provide copies of any and all testing or other analysis related to interior diameter and outer diameter of any pipe that was retired.

Response: Spire does not perform testing on the interior or outer diameters of pipe.

8529. For each project please provide evidence of physical testing Spire used to determine mains and services were in worn out and/or deteriorated condition. If no testing was performed, please describe the process Spire used to determine that the mains or services being replaced were worn out and/or deteriorated?

Response: Please see the Company's response to OPC DR 8519 in this proceeding.

8519. Did Spire East perform tests on service lines that were retired and replaced under earlier ISRS filings that indicated lines were worn out or in a deteriorated condition? If yes please provide the testing documentation for each project. If no please indicate that no testing was done.

Response: If it is economically and operationally feasible to reconnect a service line to a main that is being installed in connection with the Company's cast iron and bare steel replacement programs, it will be reused. If it is not economically or operationally feasible to reconnect a service line to a newly installed main, a new service line will be installed. As the Company has repeatedly demonstrated, such an approach does not result in any incremental increase in either the Company's ISRS costs and or the resulting ISRS charges but instead reduces them compared to the costs that would be incurred if an attempt was made to reuse service lines that cannot feasibly be economically or operationally reconnected to the main. Any effort to perform "tests" on service lines that cannot be economically or operationally reused would serve no purpose, but instead would be an unnecessary and imprudent expenditure of resources. Also see the response to DR 8505.