

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

Symmetry Energy Solutions, LLC,)	
Constellation NewEnergy-Gas Division,)	
LLC, and Clearwater Enterprises, LLC)	
)	
Complainants,)	
)	
v.)	Case Nos. GC-2021-0316, GC-2021-0315,
)	and GC-2021-0353
)	
Spire Missouri, Inc. and its operating unit)	
Spire Missouri West,)	
)	
Respondents.)	

**SYMMETRY ENERGY SOLUTIONS, LLC’S, CLEARWATER ENTERPRISES, LLC’S,
SPIRE MISSOURI, INC.’S, STAFF’S, THE OFFICE OF PUBLIC COUNSEL’S, AND
MISSOURI SCHOOL BOARDS’ ASSOCIATION’S
JOINT MOTION TO AMEND PROCEDURAL SCHEDULE**

COME NOW Symmetry Energy Solutions, LLC (“Symmetry”), Clearwater Enterprises, LLC (“Clearwater”) (together, “Complainants”), Spire Missouri, Inc. (“Respondent” or “Spire”), Staff, Office of Public Counsel and Missouri School Boards’ Association (together, the “Parties”), by and through undersigned counsel, and jointly move to amend the procedural schedule in the above-captioned cases. Complainant Constellation NewEnergy Gas Division, LLC is not a signatory to this Motion. Further, counsel for the Midwest Energy Consumers Group advises of no objection to this Motion.

Complainants noticed depositions of Spire’s corporate representative to take place in advance of Complainants’ deadlines to file direct testimony, but unfortunately that deposition must be rescheduled because Spire’s corporate representative and counsel recently tested positive for COVID-19. The Parties respectfully request minor changes to the procedural schedule to allow the depositions to go forward—safely—before Complainants file their direct

testimony. These amendments to the procedural schedule will not require any change to the dates of the evidentiary hearing.

In further support of their Joint Motion to Amend Procedural Schedule, the Parties state as follows:

1. Complainants noticed depositions of Spire’s corporate representative for November 30, 2021, in advance of Complainants’ December 3, 2021 deadline to file direct testimony. However, on November 28, two days before the depositions, Spire informed the other Parties that its witness had tested positive for COVID-19 and its lawyers may have also been exposed during their preparation meetings and were going to be tested.

2. The Parties have since met and conferred regarding a schedule that will allow the depositions of Spire’s corporate representative to proceed safely before Complainants submit direct testimony. The Parties have agreed on the following schedule:

Event	Original Dates	Proposed Updated Dates
Deposition of Respondent’s Corporate Representative	November 30, 2021	December 13, 2021
Complainants’ Direct Testimony Due	December 3, 2021	December 20, 2021
Respondent’s Rebuttal Testimony Due	January 19, 2022	January 27, 2022
Cross-Rebuttal Testimony of Staff and Intervenors Due	February 1, 2022	February 10, 2022
Surrebuttal Testimony Due	February 22, 2022	No change
List of issues, order of witnesses, cross exams and openings	February 24, 2022	No change
Last day to answer discovery	March 1, 2022	No change
Statements of Position	March 2, 2022	No change
Evidentiary Hearing	March 7-11, 2022	No change
Initial Post-Hearing Briefs	March 28, 2022	No change
Reply Briefs	April 4, 2022	No change

MOTION FOR EXPEDITED TREATMENT

Under the existing procedural schedule, Complainants' direct testimony is due this Friday, December 3, 2021. Therefore, the Parties request that the Commission grant this motion by Thursday, December 2, 2021. There will be no negative effects from the granting of this Motion. This Motion was filed as soon as it could have been under the circumstances.

WHEREFORE, the Parties respectfully request an order of the Commission amending the procedural schedule in the above-captioned cases as specified herein, and such other and further relief as is just and proper under the circumstances.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of December 2021, a copy of the foregoing **Joint Motion to Amend Procedural Schedule** has been served on all parties on the official service list for this matter via filing in the Commission's EFIS system and/or email.

/s/ Peggy A. Whipple
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