

Schedule RES-D-8

Spire Missouri Response to OPC  
Data Request 8539 -8541

**Response:** As stated above in response to DR 8527, unprotected steel services are consistently ranked among the highest items in Spire's risk analysis. Spire works closely with and is heavily regulated by the Commission's Gas Safety Staff ensuring these risks are effectively managed and addressed

8537. OPC DR 8517 asked if Spire believes that all of the non-protected steel mains currently in use in each service territory are worn out or in a deteriorated condition as those terms are used in §393.1009(5)(a)? Spire responded "Yes to the extent this question is applicable to bare steel services." Please indicate whether it is Spire's position that all of the non-cathodically protected steel **mains** it currently has in use in each service territory are worn out or in a deteriorated condition as those terms are used in §393.1009(5)(a)?

**Response:** Spire does not have unprotected steel mains on record in its system.

- a. If not, how does Spire distinguish which non-cathodically protected steel mains are worn out from those that are not?

**Response:** N/A

8538. OPC DR 8517 asked if Spire believes that all of the non-protected steel mains currently in use in each service territory are worn out or in a deteriorated condition as those terms are used in §393.1009(5)(a)? Spire responded "Yes to the extent this question is applicable to bare steel services." Please confirm that it is Spire's position that all of the non-cathodically protected steel **services** it currently has in use in each service territory are worn out or in a deteriorated condition as those terms are used in §393.1009(5)(a)?

**Response:** Yes, that is Spire's position.

- a. If not, how does Spire distinguish which non-cathodically protected steel services are worn out from those that are not?

**Response:** N/A

8539. Please provide a copy of the five most recent financial statements or other reports that Spire has filed with the United States Securities and Exchange Commission wherein Spire has disclosed that all of its cast iron mains are in a worn out or deteriorated condition.

**Response:** Spire has not included specific statements in its filings that its cast iron mains are in a worn out or deteriorated condition since there is a widespread understanding that virtually all facilities become worn out or deteriorate over time, including cast iron mains used by a utility to distribute natural gas. Investors are generally familiar with the basic concept of depreciation and therefore comprehend

are either worn out or in a deteriorated condition is also evident in the pertinent financial information associated with its ISRS mechanism and ISRS regulatory proceedings which is included in these SEC filings.

- a. If no such financial statement or other report exists, please confirm that Spire has never disclosed to the United States Securities and Exchange Commission that all of its non-cathodically protected steel services are in a worn out or deteriorated condition

**Response:** Please see the response to DR No. 8541.

8542. Please identify the last year in which spire installed new **non-cathodically protected** steel services.

**Response:** Spire is unable to identify the specific year in which Spire installed new non-cathodically protected steel services.

- a. If Spire is incapable of identifying a specific year, please indicate the best estimation for when Spire ceased Installation of new **non-cathodically protected** steel services

**Response:** Spire has not installed new non-cathodically protected steel services since the 1950's at Spire East and since the 1970's for Spire West.