BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Spire Missouri, Inc.		
d/b/a Spire's Request for Authority to		
Implement a General Rate Increase for	Case No. GR-2022-01	79
Natural Gas Service Provided in the	,)	
Company's Missouri Service Areas)	

STATEMENT OF DISCOVERY CONCERN

COMES NOW the Office of the Public Counsel ("OPC") and for its *Statement* of *Discovery Concern*, states as follows:

- 1. The OPC currently has several potential discovery concerns relating to this case in the form of overdue unanswered data requests issued on Spire Missouri, Spire Missouri's objections to certain OPC data requests, and what the OPC considers to be incomplete or improper response to data requests received from Spire Missouri.
- 2. The exact data requests and the nature of the disputes have already been communicated to Spire.
- 3. The OPC believes that these concerns may be resolved without need for a discovery conference but makes this filing now out of an abundance of caution. The OPC will continue to work with Spire to resolve its discovery concerns and will notify the Commission in the event that it no longer requires a discovery conference.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission accept this *Statement of Discovery Concern*.

Respectfully submitted,

By: /s/ John Clizer
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this twenty-sixth day of September, 2022.

/s/ John Clizer	
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