

SPIRE MISSOURI RESPONSE AND RECOVERY PLAN

PREPARED IN THE EVENT OF A GAS OUTAGE INCIDENT

DUE TO

A POTENTIAL SPIRE STL PIPELINE SHUTDOWN

COMBINED WITH A COLD WEATHER EVENT

Version 6 – 11.15.21

CONFIDENTIAL DRAFT

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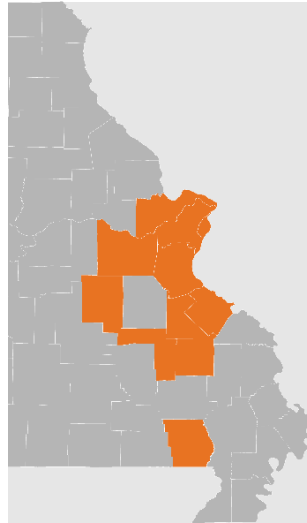
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I. BACKGROUND AND SCOPE

Spire STL Pipeline, LLC has been operating the Spire STL Pipeline for over 2 years. Its certificate to operate the Spire STL Pipeline is currently in-place through December 13, 2021. Without an operational Spire STL Pipeline and in conjunction with one or more cold weather events, there is risk of having adequate natural gas (“gas”) supply to meet demand in portions of Spire Missouri Inc. (“Spire Missouri”) eastern service territories.

This response and recovery plan addresses the counties at risk, specifically, Jefferson, Saint Charles, and St. Louis counties, and the City of Saint Louis. Spire Missouri’s preparations and planning have considered the National Preparedness Goal mission areas - prevention, protection, mitigation, response, and recovery. This plan focuses specifically on response and recovery, with the exception of inclusion of awareness and preparedness messaging in the Attachment b.



Note: Spire Missouri serves the City of St. Louis and St. Louis County, Saint Charles County, all areas and communities served in Butler, Iron, Jefferson, Madison, St. Francois and Ste. Genevieve Counties. Additional details on the service areas can be found here: [Eastern Missouri Service Area](#)

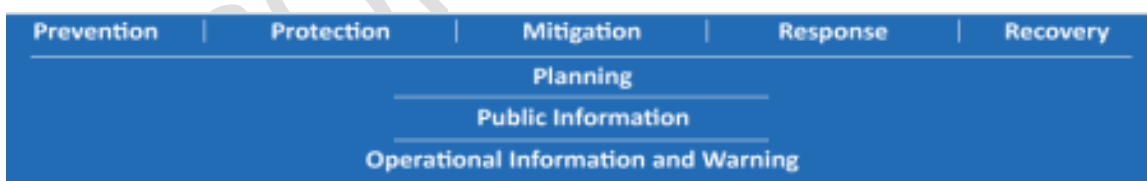
II. PURPOSE

Spire Missouri is focused on preventing this potential shortage of gas supply, but is also actively planning to help protect customers, mitigate risks, respond to gas supply shortage incidents, and help customers recover by rapidly and safely restoring services. In the event of a cold weather event with no supply from the Spire STL Pipeline (one of several sources), this plan ensures Spire Missouri will be prepared to maximize the use of the remaining gas supplies, protect lives and property, and care for impacted customers and communities. Spire Missouri will achieve this through its focus on:

- Securing alternate energy supplies
- Proactively managing consumption
- Delivering high-value customer support by leveraging regional partnerships
- Providing integrated communications by leveraging regional partnerships

III. PLAN OVERVIEW

This plan augments the Spire Inc. internal Crisis Management and Emergency Curtailment plans that detail company and business protocols and actions. For example, Spire’s Incident Command Structure (ICS), which incorporates concepts found within the National Incident Management System and ICS, can scale resource support to meet the needs of an incident. This plan is also intended to define important integration points with public and private sector Regional Response Plans. The following activities are performed before, during, and after disasters to reduce risk, save lives, and recover from incidents.



This plan provides a high-level description of Spire Missouri’s community-facing approach to the *Response* and *Recovery* phases depicted above and as defined below. It also includes plans for *Public Information* and *Operational Information and Warning* that occur prior to the initiation of the *Response* phase and during both the *Response* and *Recovery* phases.

- **Response** – Response emphasizes saving and sustaining lives, stabilizing the incident*, rapidly meeting basic human needs, restoring basic services, establishing a safe and secure environment, and supporting the transition to recovery.
- **Recovery** – Recovery is primarily focused on safely restoring natural gas services and impacted infrastructure. This includes the intake of customer claims.

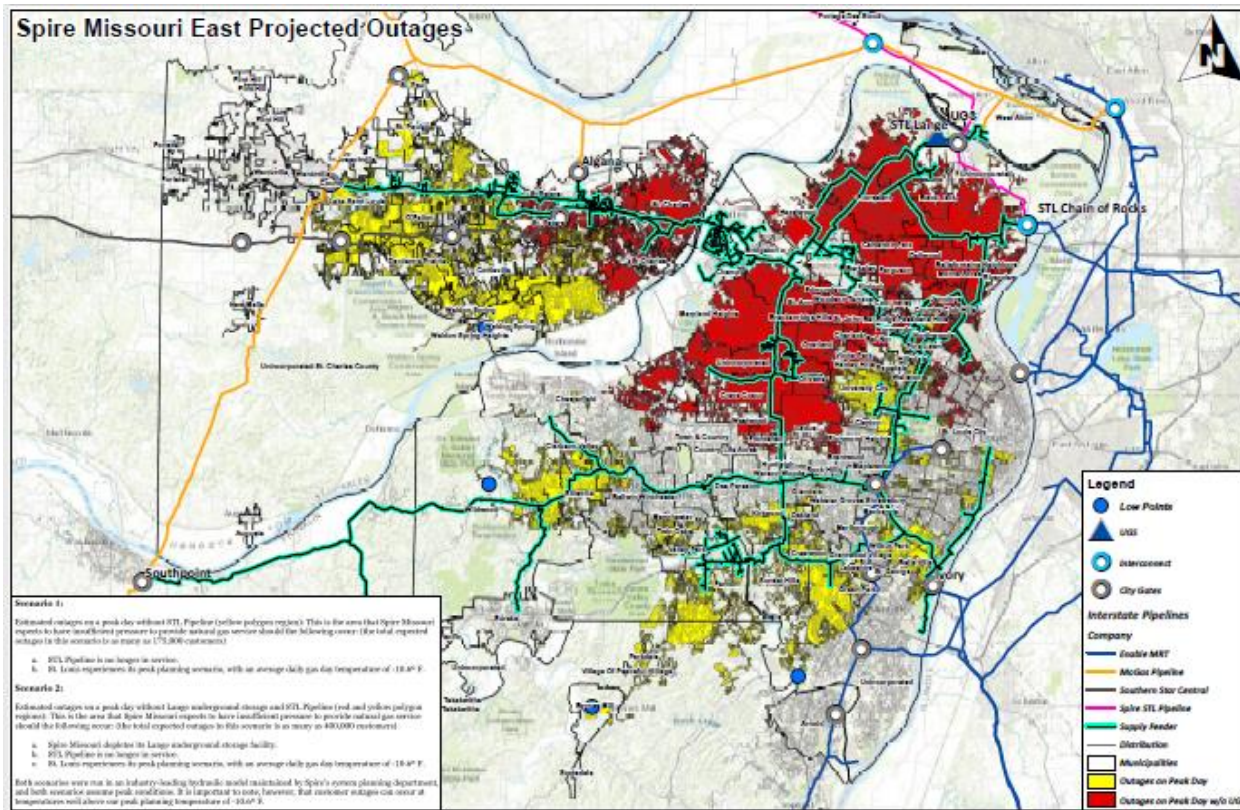
*‘Incident’ refers to an occurrence that requires a response to protect life or property. For this plan, the *Response* phase begins when a cold weather event is forecasted that requires Spire Missouri to initiate actions to request customers to limit or conserve natural gas consumption.

This plan includes the worst-case incident scenarios; however, the plan is designed to address all scenarios efficiently and effectively. It also delineates the specific progression of action steps Spire Missouri will take to reduce the risk of unplanned outages to residents and critical needs business customers. The categories of critical needs business customers are included in this plan. Due to numerous partnerships, the plan also clarifies specific Spire Missouri responsibilities.

IV. WORST-CASE INCIDENT SCENARIOS

Worst-case incidents are characterized by unplanned outages affecting residential or critical needs business customers. Spire Missouri has defined two scenarios to support regional planning based on its publicly communicated outage maps shown below.

- The first is the **plausible extreme** scenario based on a 175,000 home and business outage resulting in a 1 to 2-week outage and restoration period. (yellow shading)
- The second is the **worst-case possible** scenario based on a 400,000 home and business outage resulting in a 4 to 6-week outage and restoration period. (yellow + red shading)



Outage map Version 24 shown above was provided to regional Emergency Management partners separately in PDF form.

As designated on the map, four areas are projected to be “low points” in the system. These are Oakville, Byrnes Mill, Weldon Spring area, and Wildwood/Ellisville. A low point is an area within the affected Missouri East gas distribution system that operates at the lowest pressures due to where it sits relative to supply coming into the system. This makes these areas most susceptible to losing adequate gas pressure to serve homes and businesses when overall system pressures drop due to demand exceeding supply. We project these to be areas that could lose gas service early in an unplanned outage.

V. SPIRE MISSOURI EMERGENCY CURTAILMENT ACTION STEPS

Spire Missouri’s *Response* and *Recovery* will progress through the following action steps, the first five of which will help prevent unplanned outages that could affect residential and critical needs business customers. We will decide whether to take one or more action steps after evaluating five-day weather forecasts and system conditions. Given the Spire STL Pipeline may not be operating on December 14, we will begin monitoring the weather forecast on December 8 and may begin taking conservation actions before December 14.

After evaluating St. Louis regional weather history, we also anticipate the potential to implement controlled disconnections of business and residential customers with ~5 days of notice in order to preserve pressure in some segments of the distribution system and prevent uncontrollable loss of service. Sheltering and commodity points of distribution (PODs) may be required soon after.

In all cases, critical needs business customers are excluded from these first five actions. However, they cannot be protected from unplanned outages and associated controlled disconnections. Mutual assistance will be leveraged as needed to minimize recovery durations.

Action Steps

1. Limit transport customer usage and suspend new customer connections
2. Controlled disconnections of transport customers; request voluntary conservation of all non-transport customers excluding critical needs business customers
3. Request further voluntary conservation; request schools/businesses use alternate fuels or shift to building and product protection minimum gas usage levels
4. Perform controlled disconnection of non-residential customers, excluding critical needs business customers
5. Perform controlled system-level disconnection of customers in zones; this may include critical needs business customers
6. Mitigate impacts of unplanned system-level outages
7. Reconnect and restore services, and remove requests to limit usage

VI. SPIRE MISSOURI RESPONSIBILITIES DURING RESPONSE AND RECOVERY PHASES

Based on the St. Louis County Basic Emergency Operations Plan and an analysis of the Emergency Support Functions (ESFs), Spire Missouri has defined key community-facing responsibilities for applicable ESFs. These responsibilities are summarized in the following table. It is important to note that Spire Missouri has an extensive internal Emergency Curtailment Plan that will support these community-facing responsibilities.

NOTE: THE FOLLOWING RESPONSIBILITIES ARE PRELIMINARY AND SUBJECT TO CHANGE

BEOP Emergency Support Functions	Spire Missouri's Community-Facing Responsibilities during Response and Recovery
Information and Planning	<ul style="list-style-type: none"> • Maintain a listing of critical needs business customers to support information sharing during a response. • Provide information requested by Emergency Operations Centers (EOCs) and/or the American Red Cross to scope and establish cold weather shelters. • Maintain and share material updates to this Response and Recovery plan.
Mass Care, Emergency Assistance, Housing, and Human Assistance	<ul style="list-style-type: none"> • Support the intake of customer claims believed to be attributable to gas service outages.
Logistics Management and Resource Support	<ul style="list-style-type: none"> • Provide its own facilities and contracted resources required to support response and recovery field operations. • Financially support American Red Cross for sheltering materials in cold weather shelters (e.g., meals, snacks, clothing, comfort, and personal care items) and similar materials they may provide for any warming centers the American Red Cross supports. • Procure warming, comfort and personal care supplies and assist in distribution at Points of Distribution (PODs) <this is pending receipt of warming supply list from regional Emergency Management leadership and market availabilities> • Financially support the costs associated with renting or acquiring space for Points of Distribution
Public Health & Medical Services	<ul style="list-style-type: none"> • Augment volunteer and nursing resources at cold weather shelters established by the American Red Cross.
Energy	<ul style="list-style-type: none"> • Provide daily current and projected situational awareness information defined in this plan to Regional Emergency Management officials. • Coordinate response and recovery actions with other regional utilities.
Public Safety and Security	<ul style="list-style-type: none"> • Provide safety and security for Spire Missouri field employees and supporting facilities.
External Affairs	<ul style="list-style-type: none"> • Deliver emergency public information and protective action guidance in partnership with regional Emergency Management partners through liaisons to EOCs. • Communicate situational awareness to elected and appointed public officials. • Support customer questions and requests for help through the customer Connect Center.

As noted in the table above, during response and recovery, Spire Missouri will provide virtual liaisons to EOCs at the time of the first residential disconnection to ensure timely and accurate data and information sharing to include current and imminent residential disconnections. Spire Missouri will provide daily situational awareness in the following areas directly or via an accessible web interface:

- Immediate notifications
 - Any structure without gas service that is defined as a critical needs business customer
- Current situation
 - Current action step status (see Section V)
 - Number of disconnected customers
 - Map of controlled or unplanned outage areas
- Projected situation
 - 5-day projected weather forecast
 - 5-day projected change in action steps
 - Service restoration dates/timelines

VII. CRITICAL NEEDS BUSINESS CUSTOMER CATEGORIES

Critical needs business customers are generally considered human lifesaving and life-sustaining in nature and are excluded from any Spire Missouri-initiated curtailment actions except controlled system-level disconnects to prevent more widespread outages. They could also lose gas service during unplanned outages. A listing of these customers will be maintained outside of this plan. No residential customers will be disconnected unless they are affected by controlled system-level disconnects to prevent more widespread outages.

- Airports
- Daycares
- Dialysis Centers
- Emergency Medical Services
- Fire Stations
- Food Manufacturing
- Gas Stations
- Governmental Facilities - National security (w/approval)
- Grocery Stores and Associated Distribution Centers
- Hospitals (Level 1-3)
- Jails and Prisons
- Mental Health and Social Services
- Nursing Homes and Skilled Care
- Pharmaceutical Production
- Pharmacies
- Places of worship
- Police Stations
- Public Health Facilities
- Shelters and Warming Centers (includes Schools and Red Cross Shelters)
- Urgent Care
- Utilities (public, private)
- Water/Wastewater Treatment

VIII. ATTACHMENTS

- A. EMERGENCY CURTAILMENT ACTION STEPS PLAYBOOK**
- B. CUSTOMER AND COMMUNITY COMMUNICATIONS PLAN**

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Attachment B - Customer and Community Communications Plan

Communicating with our customers and communities

Spire Missouri Emergency Curtailment/Contingency Plan

Date: Nov. 9, 2021, V4

Description (Timing)	Messaging Pillars	Comms deliverable	Process and Channels
<p>Awareness and Preparedness (pre-event; prior to any limited use or outages)</p>	<p>The STL Pipeline is critical infrastructure that provides reliable and affordable energy to more than 650,000 Missouri homes and businesses in the St. Louis region.</p> <p>Messaging on short-term nature of current operating certificate for the Pipeline, which expires on Dec. 13.</p> <p>This temporary authorization only takes us into the heart of the winter and does not get us through what can be winter’s coldest months.</p> <p>The clock is ticking. Nov.1 marks the start of the winter heating season. Each day that passes without the assurance of an emergency certificate brings uncertainty to people and communities in the St. Louis region that they will have the energy they need.</p> <p>If the Spire STL Pipeline is not in service this winter, Spire Missouri customers may potentially see service disruptions. This could have a detrimental impact on the health and safety, property and economic prosperity of Missourians. Spire Missouri has explored alternative supply options and will continue to do so. But without the</p>	<p>Awareness-driving to preparedness assets for web content - SpireEnergy.com/Critical</p> <p>Service disruption and outage preparedness information, including info based on sources provided by the fire chiefs (USFA) and information about safely staying warm; CO monitoring; alternative fuel sources; safe heating; ways to keep warm</p>	<p>Media relations/earned media</p> <p>Social media</p> <p>Digital (web) at SpireEnergy.com/Critical -establish mail list</p> <p>Print and online ads in major local publications</p> <p>Customer email for those emails on file (TBD)</p>

Attachment B - Customer and Community Communications Plan

Description (Timing)	Messaging Pillars	Comms deliverable	Process and Channels
	<p>Spire STL Pipeline, the reality is that the supply to our region is scarce.</p> <p>We are committed to being transparent with customers and to letting everyone know that while we are working to make sure customers have the energy they rely on, there is a possibility that the Spire STL Pipeline will not be available for a portion of this winter. This could result in outages throughout the St. Louis area.</p> <p>As the St. Louis region begins to see colder temperatures and faces the very real possibility of limited natural gas supply to the St. Louis region without the Spire STL Pipeline, it's important for Spire Missouri to protect the health and safety of the region and customers who live and work here.</p> <p>Spire Missouri estimates that, without the Spire STL Pipeline, between 175,000 -400,000 Spire Missouri homes and businesses may be without gas service to heat homes, cook food and fuel industry on a peak, extreme cold weather day.*</p> <p>Our goals are to keep our customers informed about the Spire STL Pipeline, to be prepared in the event of potential outage or service disruptions and to help advocate for the continued operation of the pipeline.</p> <p>Spire Missouri is committed to supporting customers in the event of an outage this winter and is coordinating with local authorities and</p>		

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Description (Timing)	Messaging Pillars	Comms deliverable	Process and Channels
	<p>emergency management professionals to help keep customers and communities safe.</p> <p>We've created an emergency plan to reduce impact to critical needs business customers (hospitals, nursing homes, etc) and residential customers.</p> <p>If weather and supply conditions require reductions in natural gas use, our emergency plan will begin with requests for voluntary customer conservation of energy, plus limited use and/or full curtailment of our transportation customers.</p> <p>We could increase voluntary conservation actions and expand curtailments to our non-transport commercial and industrial customers.</p> <p>Our intention is to preserve service to our residential and critical needs business customers. Based upon weather and supply conditions, controlled disconnections, or planned outages, for residential customers may be required, however, to limit impacts on critical needs business customers.</p>		

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Description (Timing)	Messaging Pillars	Comms deliverable	Process and Channels
<p>Conserve energy messaging</p> <p>(Action Steps 1 - transportation customers; and Action Step 2 and 3)</p> <p>Transportation; residential and business customers asked to conserve.</p>	<p>Action Step 1: Spire Missouri is asking transportation customers – a special group of commercial customers who use our system to transport their gas and who use larger amounts of natural gas in their operations – to start reducing their usage to ensure our ability to serve critical needs and residential customers. An operational flow order is now in effect for these transportation customers.</p> <p>Our operations teams are closely monitoring the situation and we are working around the clock to keep customers safe. Working together as a community, we can do our best to keep homes warm for everyone</p> <p>Action Steps 2 and 3 As colder temperatures continue across the St. Louis area and natural gas supply remains limited, Spire Missouri is asking residential customers to lower thermostats to 68 degrees and area businesses to lower their thermostats and cut back usage as much as comfortably possible. The goal is to conserve gas supply for critical needs and limit potential outages to protect the health and safety of the region.</p>	<p>Safety and conservation messaging</p>	<p>Media relations</p> <p>Social media</p> <p>Web/digital</p> <p>Customer comms: Using automated process of notification:</p> <p>Transportation: Email Automated call Text</p> <p>Residential/Commercial: Email Automated call (Text TBD)</p>
<p>Curtailment of transportation customers to preserve residential and critical needs customers</p>	<p>Spire Missouri is disconnecting service to some larger transport customers to conserve the region’s gas supply to serve critical needs and residential customers.</p> <p>As colder temperatures continue across the St. Louis area and the natural gas supply is limited without access to the Spire STL Pipeline, we’re</p>	<p>Coordinate messaging with EOC and emergency management professionals</p> <p>Safety tips</p>	<p>Media relations</p> <p>Social media</p> <p>Web/digital</p>

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Description (Timing)	Messaging Pillars	Comms deliverable	Process and Channels
<p>Action Step 2</p> <p>Further conservation requested of residential and commercial customers</p> <p>Action Steps 2 and 3</p>	<p>asking the community’s support by reducing use of natural gas to help maintain the region’s health and safety.</p> <p>Spire Missouri is asking residential customers to restrict their natural gas use by lowering their thermostats to 55 degrees and to minimize use of natural gas appliances.</p> <p>Reducing natural gas use together as a community can help to maintain service for the health and safety of the region.</p> <p>In addition, Spire Missouri is requesting area businesses to lower thermostats as much as possible and shut down to limit natural gas use while preserving infrastructure. When possible, businesses should consider use of alternative fuels.</p> <p>Our operations teams are closely monitoring the situation, and we are working around the clock to keep customers safe. Together, we can help stabilize our system and keep gas service flowing to residential and critical needs business customers during this crucial period.</p>	<p>Distribute/add list of points of distribution to the web – for warming blankets/kits</p>	<p>Customer comms: Using automated process of notification:</p> <p>Transportation: Email Automated call Text</p> <p>Residential/Commercial: Email Automated call</p>
<p>Outages/isolated service disconnections (outage</p>	<p><i>Scenario-dependent</i> (Action Steps 4, 5, 6):</p> <p>Without the Spire STL Pipeline in service, substantially lower natural gas supply has</p>	<p>Coordinate messaging with EOC and emergency</p>	<p>Media relations</p> <p>Social media</p>

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Description (Timing)	Messaging Pillars	Comms deliverable	Process and Channels
<p>management process begins)</p> <p>Action Steps 4, 5 and 6</p>	<p>significantly impacted Spire Missouri’s ability to provide continuous service to commercial and industrial customers and to maintain our region’s natural gas system.</p> <p>We thank the community for coming together to help during this time. As we’ve focused on maintaining the health and safety of the region, we wouldn’t be where we are without them. As we weather the extreme conditions, we are still asking customers to continue working together to conserve as much energy as possible by lowering their thermostats in their homes, reducing business operations and consuming natural gas energy only at levels designed to protect plant and property at their businesses.</p> <p>Without the Spire STL Pipeline and the natural gas supply it brought to the region; we continue to see strain on our system. To maintain service for critical needs businesses and residential customers and prevent unplanned outages, we are initiating controlled system disconnections and individual service disconnections to non-critical businesses in the region.</p> <p>The region’s prolonged cold spell, in combination with a reduced gas supply without the Spire STL Pipeline, has led to critically low pressure on Spire Missouri’s system, resulting in unplanned outages for customers throughout the St. Louis region.</p>	<p>management professionals</p> <p>Safety tips (see above)</p> <p>Add list of and/or link to list of warming centers and shelters coordinated through the American Red Cross to website</p> <p>Add list of points of distribution for blankets/kits</p> <p>Add Claims phone # to website for triage</p>	<p>Web</p> <p>Customer comms: Using automated process of notification:</p> <p>Transportation: Email Automated call Text</p> <p>Residential/Commercial: Email Automated call</p>

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Description (Timing)	Messaging Pillars	Comms deliverable	Process and Channels
<p>Restoration/ reconnection</p> <p>Action Step 7</p>	<p>As temperatures begin to increase, our crews are working around the clock to reconnect customers across the communities we serve, with a focus on restoring those who provide critical needs to the region.</p> <p>We appreciate everyone’s patience. Know that we are doing everything we can to quickly restore natural gas service to our customers.</p>	<p>Web updates- restoration/outage updates</p>	<p>Media relations</p> <p>Social media</p> <p>Web</p> <p>Customer comms: Using automated process of notification:</p> <p>Transportation: Email Automated call Text</p> <p>Residential/Commercial: Email Automated call</p>