



Spire Missouri Inc.
700 Market Street
St. Louis, MO 63101

VIA ELECTRONIC MAIL

April 5, 2021

Ms. Peggy Whipple
3010 E. Battlefield, Suite A
Springfield, MO 65804

RE: Case No. GC-2021-0316. First Set of Data Requests from Symmetry Energy Solutions, LLC.

Dear Ms. Whipple,

Spire Missouri Inc. ("Spire") received Data Requests (DRs) 0001-0103 in the above referenced case on March 26, 2021, from Symmetry Energy Solutions, LLC ("Symmetry"). Spire objects to the DRs for the reasons set forth below. For your convenience, the Company has set forth the DR, followed by the objection and noted when the Company does not object to the DR.

GENERAL OBJECTIONS

All of the following General Objections are incorporated by reference in the response to each of the Requests:

- 1 The responses provided to the Requests have been prepared pursuant to a reasonable and diligent investigation and search conducted in connection with the Requests in those areas where information is expected to be found. To the extent the Requests purport to require more than a reasonable and diligent investigation and search, Spire objects on grounds that they include an undue burden or unreasonable expense.
- 2 Spire objects to the Requests to the extent they seek documents or information which are not relevant to the subject matter of this proceeding and which are not reasonably calculated to lead to the discovery of admissible evidence.
- 3 Spire objects to the Requests to the extent they seek an analysis, calculation, or compilation which has not already been performed and which Spire objects to performing.
- 4 Spire objects to the Requests to the extent they are vague and ambiguous and provide no basis from which Spire can determine what information is sought.
- 5 Spire objects to Paragraph 3 of the "Instructions and Definitions" on the grounds that producing a privilege log in each instance where a "responsive document is withheld for privilege ***or otherwise***" [emphasis added] is overbroadly and unreasonably burdensome

particularly in instances where a responsive document has no relevance to any fact or issue in this proceeding.

- 6 Spire objects to Paragraph 16a regarding the identification of an individual, to the extent it seeks information pertaining to said person's residential address or other personal information not relevant to any issue of fact or law that is the subject of this proceeding. Spire further objects to Paragraph 16 as unduly burdensome and inconsistent with discovery practices in Commission proceedings.
- 7 Spire objects to the discovery requests in the aggregate under Missouri Rule of Civil Procedure 56.01 because they are voluminous and not proportional to the needs of the case.

**OBJECTIONS TO FIRST SET OF DATA REQUESTS
FROM SYMMETRY ENERGY SOLUTIONS, LLC**

1. Produce all OFOs issued by Spire to any parties, including affiliates of Spire, affecting the Spire MO West System, including OFOs for gas and transportation imbalances at a meter, shipper, agent, or aggregator level; OFOs related to storage levels and storage withdrawal rates; and OFOs related to operational balance agreements.

Spire Missouri Inc. does not object to this Request.

2. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding the need for the OFO, including all conditions and circumstances giving rise to the need for the OFO.

Spire Missouri Inc. does not object to this Request.

3. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding the need for the OFO, including all conditions and circumstances giving rise to the need for the OFO.
4. For each OFO issued by Spire affecting the Spire MO West System, describe in detail any attempts by Spire to identify specific customers causing the conditions or circumstances giving rise to the need for the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

5. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to any attempts by Spire to identify specific customers causing the conditions or circumstances giving rise to the need for the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

6. Describe in detail Spire's evaluation, actions, and decisions regarding the protection of the integrity of the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

7. Produce all correspondence and other documents regarding Spire's evaluation, actions, and decisions regarding the protection of the integrity of the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

8. Describe in detail any risk of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

9. Produce all correspondence and other documents regarding any risk of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

10. Describe in detail any occurrence of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

11. Produce all correspondence and other documents regarding any occurrence of Spire resources on the Spire MO West System being used at or near their maximum Tariff or contractual limits.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions

of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

12. Describe in detail any risk of excess maximum allowable operating pressure on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

13. Produce all correspondence and other documents regarding any risk of excess maximum allowable operating pressure on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

14. Describe in detail any occurrence of excess maximum allowable operating pressure on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

15. Produce all correspondence and other documents regarding any occurrence of excess maximum allowable operating pressure on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

16. Describe in detail any risk of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

17. Produce all correspondence and other documents regarding any risk of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions

of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

18. Describe in detail any occurrence of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

19. Produce all correspondence and other documents regarding any occurrence of loss of sufficient line pressure to meet the Spire MO West System delivery obligations.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

20. Describe in detail any risk of any other condition that may have caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

21. Produce all correspondence and other documents regarding any risk of any other condition that may have caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

22. Describe in detail any occurrence of any other condition that caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

Spire Missouri Inc. does not object to this request.

23. Produce all correspondence and other documents regarding any occurrence of any other condition that caused Spire to be unable to deliver natural gas on the Spire MO West System consistent with its Tariff.

Spire Missouri Inc. does not object to this request.

24. Describe in detail any risk of any other failure of the integrity of the Spire MO West System.

Spire Missouri Inc. does not object to this request.

25. Produce all correspondence and other documents regarding any risk of any other failure of the integrity of the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

26. Describe in detail any occurrence of any other failure of the integrity of the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

27. Produce all correspondence and other documents regarding any occurrence of any other failure of the integrity of the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

28. For each OFO issued by Spire affecting the Spire MO West System, describe in detail any evaluation or determination by Spire regarding whether exigent circumstances existed that required immediate or expedited issuance of the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

29. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to any evaluation or determination by Spire regarding whether exigent circumstances existed that required immediate or expedited issuance of the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

30. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding the timing of issuance of the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

31. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding the timing of issuance of the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

32. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding the duration of the OFO, including all conditions and circumstances that formed the basis of Spire's decision regarding when to terminate the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

33. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding the duration of the OFO, including all conditions and circumstances that formed the basis of Spire's decision regarding when to terminate the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

34. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding whether to issue a Standard OFO or Emergency OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

35. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding whether to issue a Standard OFO or Emergency OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions

of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

36. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding whether to re-issue a Standard OFO as an Emergency OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

37. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding whether to re-issue a Standard OFO as an Emergency OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

38. For each Standard OFO issued by Spire affecting the Spire MO West System that was not re-issued as an Emergency OFO, describe in detail Spire's evaluation and decision that an Emergency OFO was not necessary or appropriate, including all conditions or circumstances that formed the basis of such determination.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

39. For each Standard OFO issued by Spire affecting the Spire MO West System that was not re-issued as an Emergency OFO, produce all correspondence and other documents related to Spire's evaluation and decision that an Emergency OFO was not necessary or appropriate, including all conditions or circumstances that formed the basis of such determination.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

40. State whether the Tariff requires Spire's actions with respect to its OFOs to be reasonable, objective, and non-discriminatory.

Spire Missouri Inc. does not object to this Request.

41. For each OFO issued by Spire affecting the Spire MO West System, describe in detail Spire's evaluation, actions, and decisions regarding ensuring that its actions with respect to the OFO were reasonable, objective, and non-discriminatory.

Spire Missouri Inc. does not object to this Request.

42. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding ensuring that its actions with respect to the OFO were reasonable, objective, and non-discriminatory.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

43. Produce all correspondence and other documents related to all requests for voluntary actions from any upstream pipeline (including SS) to Spire regarding the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

44. Produce all correspondence and other documents related to all OFOs (including OFOs for gas transport, gas deliveries, gas imbalances, storage withdraws, and operational balance agreements), functional equivalent of OFOs, critical notices, notices of any other requirement, or force majeure notices from any upstream pipeline (including SS) to Spire regarding the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

45. Produce all correspondence and other documents related to any allegation of unauthorized usage from any upstream pipeline (including SS) regarding the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

46. Produce all correspondence and other documents related to penalties and charges assessed by any upstream pipeline (including SS) to Spire regarding the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

47. Produce all correspondence and other documents regarding Spire's efforts to insure compliance with requirements of upstream pipeline companies (including SS) regarding the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

48. Identify each OFO issued by Spire to Spire transportation customers served by Symmetry.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

49. Produce all correspondence and other documents related to Spire's issuance of any OFO to Spire transportation customers served by Symmetry.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

50. For each OFO issued by Spire to Spire transportation customers served by Symmetry, describe in detail each effort to provide notice of the OFO, including the manner of notice attempted, the date and time of attempt, the person attempting to provide notice, and the intended recipient (with contact information) of the notice.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

51. For each OFO issued by Spire to Spire transportation customers served by Symmetry, produce all correspondence and other documents related to each effort to provide notice of the OFO, including the manner of notice attempted, the date and time of attempt, the person attempting to provide notice, and the intended recipient (with contact information) of the notice.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

52. State whether you contend that any Spire transportation customers served by Symmetry engaged in conduct that failed to comply with any OFO or Spire directive, and if you do, describe in detail the basis for your contention as to each.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

53. If you contend that any Spire transportation customers served by Symmetry engaged in conduct that failed to comply with any OFO or Spire directives, produce all correspondence and other documents related to your contention.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

54. State whether you contend that any Spire transportation customers served by Symmetry failed to make all reasonable attempts to comply with any OFO or Spire directives, and if you do, describe in detail the basis for your contention as to each, including a statement of any action you contend any Spire transportation customers served by Symmetry should have, but did not, take.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

55. If you contend that any Spire transportation customers served by Symmetry failed to make all reasonable attempts to comply with any OFO or Spire directives, produce all correspondence and other documents related to your contention.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

56. For each OFO issued by Spire affecting the Spire MO West System, describe in detail any attempts by Spire to remedy the conditions or circumstances giving rise to the need for the OFO, including through requests for voluntary actions.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

57. For each OFO issued by Spire affecting the Spire MO West System, produce all correspondence and other documents related to any attempts by Spire to remedy the conditions or circumstances giving rise to the need for the OFO, including through requests for voluntary actions.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information

not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

58. To the extent not produced in response to other Data Requests, produce all correspondence and other documents related to Spire's issuance of OFOs affecting the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

59. Produce all correspondence and other documents related to Spire's evaluation of whether to issue any request for voluntary action affecting the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

60. Produce all notices in any form (including those made via an electronic bulletin board, instant messaging service, online chat, messaging app, email, facsimile, text message, video conference, telephone, or commercial radio or television) to any parties, including affiliates of Spire, regarding requests by Spire for voluntary actions, including voluntary actions for the management of or adjustment to gas nominations for receipts, deliveries, imbalances, and storage levels or withdrawals.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

61. Produce all notices of POCs initiated by Spire to any parties, including affiliates of Spire, affecting the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

62. Produce all correspondence and other documents related to any POC initiated by Spire affecting the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

63. Describe in detail Spire's evaluation, actions, and decisions regarding whether to initiate any POC affecting the Spire MO West System, including all conditions and circumstances considered in the course of such evaluation, actions, and decisions.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

64. Produce all correspondence and other documents related to Spire's evaluation, actions, and decisions regarding whether to initiate any POC affecting the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine. .

65. Produce all correspondence and other documents regarding the delivery or exchange of gas by SS to Spire or by Spire to SS.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

66. Produce all correspondence and other documents regarding the injection or withdrawal of any gas owned by Spire into or from SS owned or operated storage facilities.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

67. Describe in detail any instances of gas imbalances on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

68. Produce all correspondence and other documents regarding any gas imbalances on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

69. Produce all correspondence and other documents regarding any gas imbalances on the SS System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

70. State whether the Spire MO West System was completely physically balanced on a cumulative basis by the end and for the month of February, 2021.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

71. State whether gas receipts and deliveries for any Spire transportation customers served by Symmetry were physically balanced on a cumulative basis by the end and for the month of February, 2021.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

72. Produce all correspondence between Spire and Spire Marketing.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

73. Provide a detailed list of all gas purchase, sale, exchange, and other transactions made by Spire related to the SS System or the Spire MO West System, including intra-storage transactions and any transactions within any pools on the SS System or Spire MO West System, including for each transaction:

- i. Receipt point;
- ii. Delivery point;
- iii. Volume;
- iv. Identity of seller;
- v. Identity of buyer;
- vi. Identity of any Spire employee(s) or agent(s) who participated in the transaction;
- vii. Exchange conditions;
- viii. Purchase price;
- ix. Sale price;
- x. Any penalties, charges, fees, or other adders that affected either revenue or cost associated with the transaction; and
- xi. Whether such price, penalties, charges, fees, or other adders have been paid or received by Spire.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

74. Produce all correspondence and documents related to all gas purchase, sale, exchange, and other transactions made by Spire related to the SS System or the Spire MO West System, including intra-storage transactions and any transactions within any pools on the SS System or Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

75. Produce documents sufficient to show the daily gas volumes owned or managed by Spire in storage on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

76. Produce documents sufficient to show the daily gas volumes owned or managed by Spire injected into storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

77. For each injection of gas into storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System, produce documents sufficient to show the volume of gas, the source from which the gas was obtained, and all sums Spire paid for the gas.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

78. Produce documents sufficient to show the daily gas volumes owned or managed by Spire withdrawn from storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

79. For each withdrawal of gas from storage for Spire's account on the Spire MO West System, the SS System, or any other upstream pipeline system with access to the Spire MO West System, produce documents sufficient to show the volume of gas, the customer or other party to whom the gas was provided, and all sums paid to Spire for the gas.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

80. Provide a detailed, daily list of all nomination changes and physical curtailments made by Spire for and on gas transport, receipt, and delivery volumes for any Spire transportation customers served by Symmetry.

Objection Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

81. Produce all correspondence and other documents related to all nomination changes and physical curtailments made by Spire for and on gas transport, receipt, and delivery volumes on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

82. Produce all notices in any form (including those made via an electronic bulletin board, instant messaging service, online chat, messaging app, email, facsimile, text message, video conference, telephone, or commercial radio or television) to any parties, including affiliates of Spire, regarding any changes to confirmed gas receipt and delivery nominations.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

83. Produce all notices in any form (including those made via an electronic bulletin board, instant messaging service, online chat, messaging app, email, facsimile, text message, video conference, telephone, or commercial radio or television) to any parties, including affiliates of Spire, regarding daily retainage-adjusted confirmed nominations.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

84. Provide a detailed list of all unauthorized deliveries under any OFO or during a POC affecting the Spire MO West System, including for each such unauthorized delivery the customer, meter, and daily unauthorized volume.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

85. Produce all correspondence and other documents related to all unauthorized deliveries under an OFO or during a POC on the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine. .

86. Provide a detailed list of all penalties and charges assessed related to any OFO or POC affecting the Spire MO West System, including for each such penalty or charge the customer, any customer agent, any customer marketer, the OFO or POC underlying the penalty or charge, the amount of the penalty or charge, and the basis for the calculation of the penalty or charge.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

87. Produce all correspondence and other documents related to any penalties and charges assessed related to any OFO or POC affecting the Spire MO West System.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

88. Describe in detail your method of calculation for each penalty or charge assessed against Spire transportation customers served by Symmetry.

Spire Missouri Inc. does not object to this Request.

89. Describe in detail your factual basis for each penalty or charge assessed against Spire transportation customers served by Symmetry.

Spire Missouri Inc. does not object to this Request.

90. Describe in detail your legal basis for each penalty or charge assessed against Spire transportation customers served by Symmetry.

Spire Missouri Inc. does not object to this Request.

91. For each penalty or charge assessed against Spire transportation customers served by Symmetry, describe in detail all costs incurred by Spire in connection with providing the services giving rise to the penalty or charge.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

92. Produce all correspondence and other documents related to any penalties and charges assessed to Spire transportation customers served by Symmetry, including all documents related to all prices and volumes on which Spire is basing the calculation of such penalties and charges and all documents related to the costs incurred by Spire in connection with the services giving rise to such penalties and charges.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

93. Produce proof of all gas purchases and associated costs on a per-unit total for all purchases on which Spire is relying for its assessment of penalties and charges to Spire transportation customers served by Symmetry.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

94. State whether the Tariff requires that all penalties associated with an OFO be limited as practicable to address only the problem(s) giving rise to the need for the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions

of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

95. For each penalty or charge assessed against Spire transportation customers served by Symmetry, describe in detail Spire's evaluations, actions, and decisions regarding limiting the penalty or charge as practicable to address only the problem(s) giving rise to the need for the OFO associated with the penalty or charge.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

96. For each penalty or charge assessed against Spire transportation customers served by Symmetry, produce all correspondence and other documents related to Spire's evaluations, actions, and decisions regarding limiting the penalty or charge as practicable to address only the problem(s) giving rise to the need for the OFO associated with the penalty or charge.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

97. For any penalties and charges associated with an OFO affecting the Spire MO West System, describe in detail Spire's evaluations, actions, and decisions regarding limiting the amount and duration of the penalties and charges as practicable to address only the problem(s) giving rise to the need for the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

98. For any penalties and charges associated with an OFO affecting the Spire MO West System, produce all correspondence and other documents related to Spire's evaluations, actions, and decisions regarding limiting the amount and duration of the penalties and charges as practicable to address only the problem(s) giving rise to the need for the OFO.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

99. State your monthly gross profit for the Spire MO West System for the months of February 2020, November 2020, December 2020, January 2021, and February 2021, taking into account all penalties and charges assessed (even if not yet collected).

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

100. State your monthly gross profit attributable to Spire transportation customers served by Symmetry for the months of February 2020, November 2020, December 2020, January 2021, and February 2021, taking into account all penalties and charges assessed (even if not yet collected).

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

101. Please identify and provide supporting documentation for the gas purchases Spire refers to its Motion to Intervene and Comments of Spire Missouri Inc. in the proceeding before the Federal Energy Regulatory Commission, Docket No. RP21-618-000, in which it states “Spire Missouri acquired significant quantities of flowing gas to ensure it could meet the requirements of its customers and incurred a considerable expense to do so during the period of peak demand.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

102. Produce all correspondence with S&P Global Platts, including but not limited to any affiliate and representative, regarding its published pricing during the OFO Period.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

103. To the extent not produced in response to other Data Requests, produce all correspondence and other documents related to the Winter Storm Event.

Objection: Spire Missouri Inc. objects to this request as it is overly broad, unduly burdensome, irrelevant, not reasonably tailored or proportional to the needs of the case, and seeks information not reasonably calculated to lead to the discovery of admissible evidence relating to the questions of law and fact at issue in this proceeding. Additionally, it seeks information protected by the attorney-client privilege and work product doctrine.

Sincerely,

/s/ Matthew Aplington

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