

**Exhibit No:** \_\_\_\_\_  
**Issue:** **Winter Storm Uri,  
Operational Flow  
Order**  
**Witness:** **Justin Powers**  
**Type of Exhibit:** **Rebuttal Testimony**  
**Sponsoring Party:** **Spire Missouri Inc.**  
**Case Nos.:** **GC-2021-0315,  
GC-2021-0316 and  
GC-2021-0353**  
**Date Testimony Prepared:** **January 27, 2022**

**SPIRE MISSOURI INC.**  
**CASE NOS. GC-2021-0315, GC-2021-0316 AND GC-2021-0353**  
**REBUTTAL TESTIMONY**  
**OF**  
**JUSTIN POWERS**  
**JANUARY 27, 2022**

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**SCHEDULE:**

**Schedule JP-R1:      Weather Forecast**

**REBUTTAL TESTIMONY OF JUSTIN POWERS**

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**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Justin Powers, and my business address is 700 Market Street, St. Louis, Missouri, 63101.

**Q. WHAT IS YOUR PRESENT POSITION?**

A. I am employed by Spire Missouri Inc. (“Spire Missouri” or “Company”) as the Director of Gas Supply.

**Q. PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.**

A. I have been in my present role since 2014. In my position I am responsible for the gas supply strategy to ensure safe and reliable service to all customers at all times at each of our operating units, Spire Missouri East, Spire Missouri West, Spire Alabama, Spire Gulf and Spire Mississippi.

**Q. WHAT WAS YOUR PROFESSIONAL EXPERIENCE PRIOR TO ASSUMING YOUR CURRENT POSITION?**

A. I have worked for Spire or its predecessor companies since 2006. Prior to my current role, I worked as a trader and scheduler for Laclede Energy Resources, which subsequently changed its name and became Spire Marketing. Prior to that, I worked briefly in the Financial Reporting group at Laclede Gas, which is now known as Spire Missouri.

**Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

A. I have a Bachelor of Science degree with a double major in Accountancy and Economics/Finance from Mckendree University of Lebanon, Illinois.

**Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THIS COMMISSION?**

1 A. No.

2 **I. PURPOSE OF TESTIMONY**

3 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

4 A. The purpose of my testimony is to discuss the processes Spire utilized to monitor and react to  
5 Winter Storm Uri to ensure its customers continued to receive service during Winter Storm  
6 Uri, and to provide a timeline leading up to the issuance of a standard operational flow order  
7 (“OFO”) in response to the direct testimony filed in these matters.

8 **II. WINTER STORM URI**

9 **Q. WHAT TYPE OF STORAGE POSITION DID SPIRE HAVE ON THE SOUTHERN**  
10 **STAR SYSTEM IN FEBRUARY 2021?**

11 A. Spire Missouri entered February with a very healthy storage position of approximately 9 Bcf.

12 **Q. WHEN DID YOU BECOME AWARE OF WINTER STORM URI AND ITS**  
13 **POSSIBLE EFFECTS IT MAY HAVE ON SUPPLY TO SPIRE’S CUSTOMERS IN**  
14 **MISSOURI?**

15 A. As part of my responsibilities, my team and I are constantly monitoring weather forecasts.  
16 Early in February, the forecasts started to look extremely ominous across most of the country.  
17 With the forecasted low temperatures, Spire was well aware that the demand for natural gas  
18 would increase as a result of increased heating demand everywhere. The forecast also showed  
19 that this was going to be an extended cold period. An extended period of low temperatures is  
20 much more difficult to manage compared to a single day or two. This is because once the  
21 integrity of your distribution system begins to be strained, you don’t have the ability to catch  
22 up pressure wise with the heavy pull on the system. Please see Schedule JP–R1.

23 **Q. WHAT WERE THE PREDICTIONS FOR FEBRUARY 2021?**

1 A. The forecast for Missouri was dire, as demonstrated by Schedule JP-R1. Similarly, the  
2 forecasts indicated that Texas and Oklahoma would experience near record low temperatures  
3 and an extended period of extreme weather. This had me concerned about potential upstream  
4 supply issues due to the quantity of natural gas produced in Texas and Oklahoma, which  
5 ultimately makes its way into the Southern Star system. Extended periods of cold are also  
6 much more disruptive on the upstream side due to natural gas wellhead freeze-offs. Natural  
7 gas wellhead freeze-offs happen when outside temperatures drop below freezing in producing  
8 fields. The big problem with an extended period of cold is that once wellheads begin to freeze-  
9 off they will not be able to produce again until outside temperatures allow them to.

10 **Q. WHAT ACTIONS DID YOU TAKE AFTER REVIEWING THE WEATHER**  
11 **FORECASTS?**

12 A. On February 9, 2021, prior to the storm and after reviewing our weather forecasts, I directed  
13 Spire Missouri to put in a service request with Southern Star Central Pipeline (Southern Star)  
14 to shift 25,000 Dth/day of firm transportation rights away from the Production Market  
15 Interface on Southern Star, which relies on deliveries mostly from Texas and Oklahoma to  
16 Rex St. Joe, which relies on deliveries from the Rockies. Also, on February 9, I directed Spire  
17 Missouri to secure 35,000 Dth/day of supply with Mico from the Rockies for Gas Day 11-  
18 19 in anticipation of upstream supply issues stemming from the near record low temperatures  
19 forecast for the Texas/Oklahoma production regions.

20 **Q. WHY DID YOU TAKE THESE ACTIONS?**

21 A. We were concerned about potential production problems such as wellhead freeze offs in Texas  
22 and Oklahoma.

1 **Q. ARE THESE ACTIONS LIMITED TO UTILITIES OR ARE OTHER ENTITIES**  
2 **ABLE TO MAKE SIMILAR TRANSACTIONS IN REGARD TO CAPACITY?**

3 **A.** The actions Spire Missouri took are not limited to utilities. Any entity involved in the natural  
4 gas market that held firm transportation could make similar transactions, including marketers.

5 **Q. AS THE STORM APPROACHED, WHAT ACTIONS DID YOU TAKE?**

6 **A.** As the storm approached, my team and I were continually watching the forecasts and  
7 monitoring the situation. We barely slept for about four days because we were constantly  
8 monitoring our natural gas supplies, receipts, and system pressures both upstream and on our  
9 distribution system throughout each nomination cycle. During this time, I was in touch with  
10 other industry participants, including representatives from Southern Star. I was also in regular  
11 communication around the clock with my team and other individuals at Spire Missouri.

### 12 **III. OPERATIONAL FLOW ORDER (OFO)**

13 **Q. HAVE YOU RECOMMENDED THAT SPIRE ISSUE AN OFO IN THE PAST?**

14 **A.** No. I have been the Director of Gas Supply for Spire Missouri since 2014 and the first time I  
15 recommended an OFO was in February 2021.

16 **Q. WHAT WAS DIFFERENT ABOUT THIS SITUATION THAT MADE YOU DECIDE**  
17 **THAT RECOMMENDING AN OFO WAS THE BEST DECISION?**

18 **A.** As I mentioned above, the forecasts across much of the county looked extremely dire. This  
19 was coupled with the fact that some of the largest producing areas in the country were  
20 forecasted to see near record low temperatures. The standard OFO is the only preemptive  
21 safeguard Spire Missouri has as point operator to ensure that Spire Missouri has sufficient  
22 capacity to continue to provide service to its customers. The Southern Star tariff confirms that  
23 this is an appropriate purpose for an OFO, stating (section 10.1, General Terms and  
24 Conditions, Revised Sheet No. 250):

1 A Standard Operational Flow Order shall consist of pre-emptive or preventive actions or  
2 measures that neutralize or reduce threats to, or otherwise preserve, as reasonably deemed  
3 necessary by Southern Star, the integrity of all or a portion of its system. An Emergency  
4 Response Operational Flow Order shall consist of actions or measures required by Southern  
5 Star that neutralize or reduce threats to, or otherwise preserve, the integrity of all or a portion  
6 of its system which requires immediate response as reasonably deemed necessary by Southern  
7 Star.

8 **Q. COMPLAINANTS CRITICIZE SPIRE FOR NOT SIMPLY USING STORAGE TO**  
9 **COVER ALL MARKETER UNDER-DELIVERIES. CAN YOU EXPLAIN THE**  
10 **WITHDRAWAL RESTRICTIONS ON SOUTHERN STAR?**

11 A. I would like to quote the storage withdrawal restrictions directly from the Southern Star tariff  
12 (TSS Rate Schedule, Section 2, Tariff Sheet 103):

13 Any Shipper under rate schedule TSS-M shall specify a MDTQ by area in the executed Trans-  
14 Storage Service Agreement. When Shipper requires deliveries at its MDTQ, at least one-third  
15 of but no more than one-half of the total deliveries of gas shall be from flowing supply sources  
16 and at least one-half of but no more than two-thirds of the total deliveries of gas shall be from  
17 storage. Shippers under Rate Schedule TSS-M shall have transportation quantity rights in the  
18 market area equal to the MDTQ of the service agreement, firm storage withdrawal rights equal  
19 to at least one-half of but no more than two-thirds of the MDTQ of the service agreement, and  
20 transportation quantity rights in the production area (if applicable) equal to no more than one-  
21 half of the MDTQ of the service agreement (plus all fuel and loss in the market area). Shippers  
22 under Rate Schedule TSS-P shall have transportation quantity rights in the production area

1 equal to the MDTQ under the service agreement and firm storage withdrawal rights equal to  
2 at least one-half of but no more than two-thirds of the MDTQ under the service agreement.

3 **Q. WHAT DOES THIS MEAN IN PRACTICE?**

4 A. This means that the limiting factor for how much natural gas can be received into the Spire  
5 MO West System from its Southern Star storage contract is the actual volume of confirmed,  
6 flowing natural gas supply that Spire Missouri sources into Southern Star's market area to  
7 deliver to its city gate. The limiting factor was never how much inventory Spire Missouri had  
8 in its storage account on Southern Star. This distinction is crucial to understanding Spire  
9 Missouri's storage limitations when managing natural gas supply and imbalances with  
10 Southern Star.

11 **Q. WHAT PERCENTAGE OF FLOWING GAS TO TOTAL DELIVERIES DID SPIRE**  
12 **HAVE DURING FEBRUARY 12TH THROUGH FEBRUARY 18TH?**

13 A. Spire Missouri was at or near our limits on what we could pull from our no-notice storage  
14 contract with Southern Star. The chart below was provided to me by Southern Star, and  
15 illustrates Spire Missouri's utilization of SSC storage during the OFO period.

Spire 27237 Activity 2-12-2021 to 2-18-2021 (w/o Tenaska Mkt Pool - Storage)					
Date	PMI - Prod	Flowing Gas (FG) - PMI/Mkt Net Receipts	Storage WD	Total Market Deliveries (AMD)	Percentage of Flowing Gas
2/12/2021	105,427	186,705	332,389	538,950	34.64%
2/13/2021	96,768	177,002	322,955	533,216	33.20%
2/14/2021	74,967	162,353	399,557	622,980	26.06%
2/15/2021	88,432	199,194	408,767	627,961	31.72%
2/16/2021	98,687	197,585	322,852	555,375	35.58%
2/17/2021	97,369	170,477	272,443	476,179	35.80%
2/18/2021	103,504	180,556	199,278	413,093	43.71%

17 **Q. WHAT DOES THIS CHART TELL US ABOUT SPIRE MISSOURI'S USE OF**  
18 **SOUTHERN STAR STORAGE DURING WINTER STORM URI?**

19 A. Based on the Two Thirds Rule, we would be maximizing our authorized use of Southern Star  
20 storage when flowing supply accounts for only 33% of total market area deliveries. As you  
21 can see, we were very near 33% on almost all days of the OFO period. In fact, we exceeded



1 our maximum use of Southern Star storage gas on two days during the heart of the Winter  
2 Storm Uri event.

3 **Q. DID SOUTHERN STAR ISSUE ANY OFOS AS A RESULT OF WINTER STORM**  
4 **URI?**

5 **A.** Yes. Southern Star issued its own pipeline OFO on February 9, 2021. As point operator on  
6 Southern Star's system, Spire Missouri was ultimately responsible for any Southern Star OFO  
7 penalties at the Kansas City receipt points, regardless of whether those penalties were the  
8 result of usage by Spire Missouri or other shippers.

9 **Q. DID ANY OTHER COMPANIES OR PIPELINES ISSUE OFOS AS A RESULT OF**  
10 **WINTER STORM URI?**

11 **A.** Yes. Natural Gas Pipeline (NGPL) issued an OFO on February 10, 2021 in its Market Delivery  
12 Zone effective 9:00 am Central Clock Time, Friday, February 12, 2021, and continuing until  
13 further notice. Tallgrass Interstate Gas Transmission (TIGT) issued an OFO on February 12,  
14 2021 effective Saturday, February 13, 2021, and continuing until further notice. Enable Gas  
15 Transmission ("EGT") issued an OFO on February 10, 2021, effective immediately and  
16 continuing until further notice. The majority of surrounding pipelines that serve Spire  
17 Missouri issued preemptive OFOs to maintain system deliverability and operational integrity,  
18 and did so until further notice.

19 **Q. DID ANY OTHER UTILITIES ISSUE OFOS AS A RESULT OF WINTER STORM**  
20 **URI?**

21 **A.** Yes. I understand that other natural gas utilities in Missouri and Kansas also issued OFOs  
22 during the Winter Storm Uri event. This includes Kansas Gas Service, which serves areas of  
23 Kansas adjoining our Missouri West service territory, as well as Empire District and Liberty

1 Utilities in Missouri. See p. 74, Staff Report in File No. AO-2021-0264., which is attached to  
2 Spire witness Scott Weitzel's Rebuttal Testimony, Schedule SAW-3.

3 **IV. CONCLUSION**

4 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

5 A. Yes, it does.

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

Constellation NewEnergy-Gas Division, )  
LLC, Complainant v. Spire Missouri, Inc. )  
d/b/a Spire, Respondent )

File Nos. GC-2021-0315  
GC-2021-0316  
GC-2021-0353

Symmetry Energy Solutions, LLC, )  
Complainant v Spire Missouri, Inc. d/b/a )  
Spire, Respondent )

Clearwater Enterprises, L.L.C., Complaint )  
v Spire Missouri, Inc. d/b/a Spire and its )  
Operating Unit Spire Missouri West, )  
Respondent )

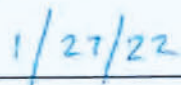
AFFIDAVIT

STATE OF MISSOURI )  
CITY OF ST. LOUIS ) SS.

Justin Powers, of lawful age, being first duly sworn, deposes and states:

1. My name is Justin Powers, I am the Director of Gas Supply at Spire Missouri Inc. My business address is 700 Market St., St. Louis, Missouri, 63101.
2. Attached hereto and made a part hereof for all purposes is my rebuttal testimony on behalf of Spire Missouri Inc.
3. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

  
Justin Powers

  
Date

<b>MURRAY &amp; TRETTEL, INC/WEATHER COMMAND</b>						<b>SPIRE</b>		
Certified Consulting Meteorologists						Phone:		
Phone:847-963-9000 ext 2						FAX: 314-531-4013		
FAX:847-963-0245								
FORECAST CONTROL POINT: STL-Lambert Intn'l Airport						DAY: WEDNESDAY		
Date: 10-Feb-21		Time: 2:30 AM		REV: 0		FCSTR: MM		
<b>DAY 1: WEDNESDAY-FEBRUARY 10, 2021</b>						PROJ. GAS DAY AVG: 15.79		
<b>THIS MORN'S LOW:</b> 14		<b>24 HR AVG</b> 18.6		<b>MIN:</b> 17		<b>MAX:</b> 21		
TIME PERIOD	AVERAGE TEMPERATURE		WIND				SKY CONDITION	
	PRED	ACTUAL	DIRECTION		SPEED		PRED	ACTUAL
			PRED	ACTUAL	PRED	ACTUAL		
3AM to 7AM	14.3		NE		7.8		0.0	
7AM to 9AM	15.5		NE		9.5		21%	
9AM to 1PM	18.5		NE		11.5		21%	
1PM to 5PM	20.5		NE		13.8		21%	
5PM to 9PM	19.3		NNE		11.8		3.0	
9PM to 3AM	18.0		NNE		8.8		3.0	
3AM to 7AM	17.0		NNE		7.3		3.0	
7AM to 9AM	18.5		NNE		10.0		21%	
<b>GENERAL SUMMARY-DAY 1</b>								
SNOW SHOWERS LIKELY EARLY ON. SOME RAIN/MIXED PRECIPITATION POSSIBLE. PRECIPITATION THINNING OUT AS THE DAY PROGRESSES. OTHERWISE MAINLY CLOUDY AND COLD.								
<b>DAY 2: THURSDAY-FEBRUARY 11, 2021</b>								
<b>24 HR AVG</b> 16.5		<b>MIN:</b> 12		<b>MAX:</b> 21				
TIME PERIOD	AVERAGE TEMPERATURE		WIND				SKY CONDITION	
	PRED	ACTUAL	DIRECTION		SPEED		PRED	ACTUAL
			PRED	ACTUAL	PRED	ACTUAL		
9AM to 1PM	20.3		NNE		15.3		21%	
1PM to 5PM	20.3		N		16.5		21%	
5PM to 9PM	17.5		N		12.8		3.0	
9PM to 3AM	14.5		N		10.3		3.0	
3AM to 7AM	12.3		N		10.0		3.0	
7AM to 9AM	14.0		N		11.5		21%	
<b>GENERAL SUMMARY-DAY 2</b>								
SCATTERED SNOW SHOWERS THROUGH THURSDAY EVENING. LINGERING FLURRIES POSSIBLE OVERNIGHT INTO FRIDAY. OTHERWISE MOSTLY CLOUDY AND COLD.								
<b>EXTENDED OUTLOOK</b>								
							<b>AVG</b>	
	DAY 3:	FRIDAY		LOW	AM LOW	HIGH	AVG	WIND
	DAY 4:	SATURDAY		12	12	20	15.8	13
	DAY 5:	SUNDAY		3	12	20	11.0	12
	DAY 6:	MONDAY		3	3	13	7.7	13
				9	3	14	11.4	11
<b>GENERAL SUMMARY-DAY 3</b>								
PARTLY SUNNY AND CONTINUED COLD.								

<b>MURRAY &amp; TRETTEL, INC/WEATHER COMMAND</b>							<b>SPIRE</b>		
Certified Consulting Meteorologists							Phone:		
Phone:847-963-9000 ext 2							FAX: 314-531-4013		
FAX:847-963-0245									
Date: 10-Feb-21					Time: 2:30 AM	REV: 0	DAY: WEDNESDAY		
							FCSTR: MM		
<b>FORECAST CONTROL POINT: MCI-Kansas City Intn'l Airport</b>								<b>AVG WIND</b>	
	DATE	LOW		AM LOW		HIGH		24HR AVG	
DY 1 WED	10-Feb-21	9		8		18		13.5	12
DY 2 THU	11-Feb-21	2		9		17		9.5	12
DY 3 FRI	12-Feb-21	-1		2		10		4.5	13
DY 4 SAT	13-Feb-21	-6		-1		10		2.0	12
DY 5 SUN	14-Feb-21	-3		-6		6		1.5	9
DY 6 MON	15-Feb-21	-1		-3		10		4.5	11
<b>FORECAST CONTROL POINT: STJ-St Joseph, Missouri</b>								<b>AVG WIND</b>	
	DATE	LOW		AM LOW		HIGH		24HR AVG	
DY 1 WED	10-Feb-21	5		5		15		10.0	12
DY 2 THU	11-Feb-21	-2		5		14		6.0	12
DY 3 FRI	12-Feb-21	-4		-2		8		2.0	13
DY 4 SAT	13-Feb-21	-9		-4		7		-1.0	11
DY 5 SUN	14-Feb-21	-7		-9		3		-2.0	9
DY 6 MON	15-Feb-21	-3		-7		7		2.0	11
<b>FORECAST CONTROL POINT: JLN-Joplin, Missouri</b>								<b>AVG WIND</b>	
	DATE	LOW		AM LOW		HIGH		24HR AVG	
DY 1 WED	10-Feb-21	18		18		25		21.5	13
DY 2 THU	11-Feb-21	11		18		23		17.0	12
DY 3 FRI	12-Feb-21	7		11		19		13.0	13
DY 4 SAT	13-Feb-21	-1		7		17		8.0	12
DY 5 SUN	14-Feb-21	4		-1		10		7.0	10
DY 6 MON	15-Feb-21	8		4		16		12.0	10
<b>COMMENTS</b>									
KC DAY 1- CLOUDY AND COLD WITH CHANCES OF INTERMITTENT SNOW SHOWERS.									
KC DAY 2- CLOUDY AND CONTINUED COLD WITH A CHANCE OF SNOW EARLY.									
KC DAY 3- MOSTLY CLOUDY AND COLDER WITH A SLIGHT CHANCE OF SNOW LATE.									