

GEORGE E. GODAT 12/13/2021

Page 1		Page 3	
1	BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI	1	Exhibit 13 Spire Missouri Schedule of 261
2		2	Rates and Charges
3	Constellation NewEnergy-Gas ) Division, LLC, )	3	Exhibit 14 Clearwater notice of 283
4	Complainants, )	4	deposition
5	vs. ) Case No. GC-2021-0315	5	Exhibit 15 Clearwater complaint 322
6	Spire Missouri, Inc. and its ) operating unit Spire Missouri West,)	6	
7	Respondents. )	7	(The original exhibits were retained by the court
8	Symmetry Energy Solutions, LLC. )	8	reporter to be attached to the original and copies
9	Complainants, )	9	of the transcript.)
10	vs. ) Case No. GC-2021-0316	10	
11	Spire Missouri, Inc. and its ) operating unit Spire Missouri West,)	11	
12	Respondents. )	12	
13	Clearwater Enterprises, LLC. )	13	
14	Complainants, )	14	
15	vs. ) Case No. GC-2021-0353	15	
16	Spire Missouri, Inc. and its ) operating unit Spire Missouri West,)	16	
17	Respondents. )	17	
18	VIDEO-RECORDED DEPOSITION OF GEORGE E. GODAT	18	
19	(Corporate Representative of Spire Missouri, Inc. and its operating unit Spire Missouri West)	19	
20	TAKEN ON BEHALF OF THE COMPLAINANTS	20	
21	DECEMBER 13, 2021	21	
22	(Starting time of the deposition: 8:08 a.m.)	22	
23		23	
24		24	
25		25	

Page 2		Page 4	
1	I N D E X	1	VIDEO-RECORDED DEPOSITION OF GEORGE E. GODAT
2	QUESTIONS BY: PAGE	2	as the Corporate Representative of Spire Missouri,
3	MR. BAUER 13	3	Inc. and its operating unit Spire Missouri West,
4	MR. HOWELL 146	4	produced, sworn and examined on December 13, 2021,
5	MS. BELL 284	5	between the hours of eight o'clock in the forenoon
6	MR. BAUER 337	6	and eight o'clock in the evening of that day, at the
7		7	offices of Dowd Bennett LLP, 7733 Forsyth Blvd.,
8	E X H I B I T S	8	19th Floor, St. Louis, Missouri 63105, before
9	EXHIBIT PAGE	9	William L. DeVries, a Certified Court Reporter (MO),
10	Exhibit 1 Notice of deposition 16	10	Registered Diplomate Reporter, and Certified
11	Exhibit 2A Binder 1 of materials 93	11	Realtime Reporter, in certain causes now pending
12	Exhibit 2B Binder 2 of materials 93	12	before the Public Service Commission of the State of
13	Exhibit 3 2-17-21 Spire correspondence 112	13	Missouri, between Constellation NewEnergy-Gas
14	Exhibit 4 PowerPoint presentation 129	14	Division, LLC; Symmetry Energy Solutions, LLC;
15	Exhibit 5 Murray & Trettel document 130	15	and Clearwater Enterprises, LLC, Complainants, vs.
16	Exhibit 6 9-9-21 e-mail chain 131	16	Spire Missouri, Inc. and its operating unit Spire
17	Exhibit 7 2-29-21 e-mail chain 135	17	Missouri West, Respondents; taken on behalf of the
18	Exhibit 8 MOW Transportation Comms 136	18	Complainants.
19	2-17-21	19	
20	Exhibit 9 2-10-21 Payne e-mail 138	20	
21	Exhibit 10 2-17-21 e-mail chain 139	21	
22	Exhibit 11 2-24-21 Spire letter to 140	22	
23	Symmetry	23	
24	Exhibit 12 Constellation notice of 226	24	
25	deposition	25	

<p>Page 149</p> <p>1 A. I would -- I would have to actually 2 look back at the actual notice. 3 <b>Q. Okay. And do you have that with you?</b> 4 A. Not that I recall. 5 <b>Q. Okay. Did you look at the notice in 6 preparation for testifying for any of the 7 depositions today?</b> 8 A. I don't recall looking at that. 9 <b>Q. Okay. All right. Does Spire use -- I 10 want to ask you a little bit about document 11 collection process and let me just start with this: 12 What -- what types of -- are you issued a device by 13 Spire, like a computer?</b> 14 A. I am. 15 <b>Q. Okay. And what kind -- is it an Apple 16 computer or is it a Windows-based computer?</b> 17 A. It's a Windows-Based computer. 18 <b>Q. Okay. And do you guys use -- does 19 Spire use Microsoft Office 365?</b> 20 A. I believe that's -- that's the -- 21 that's the system that we use. 22 <b>Q. Okay. And do you use Microsoft Teams 23 for internal meetings and chat?</b> 24 A. Yeah, we have several systems that we 25 use, and Teams is one of those.</p>	<p>Page 151</p> <p>1 <b>Q. Okay. Have you ever attempted to 2 record any phone or video conversations either 3 related to the winter storm or related to this 4 proceeding?</b> 5 A. I have not. 6 <b>Q. Are you aware of whether any other 7 individual at Spire has attempted to record any 8 phone or video meeting related to the winter storm 9 or related to this regulatory proceeding?</b> 10 A. I'm not aware of any phone or video 11 conversations that have been recorded. 12 <b>Q. I'm sorry, you trailed off a little bit 13 at the end. You said you're not aware of any phone 14 or video recordings that were recorded?</b> 15 A. That's correct. 16 <b>Q. Understand. Other than Teams and Skype 17 for internal meetings, are there other internal chat 18 or instant communication services that you use?</b> 19 A. I'm not aware of any others that I use. 20 <b>Q. Okay. Are you aware of any that -- any 21 other chat or instant messaging systems that Spire 22 makes available to its -- its employees and 23 officers?</b> 24 A. I am not. 25 <b>Q. Okay. Do you -- does Spire use any</b></p>
<p>Page 150</p> <p>1 <b>Q. Okay. Do you use Microsoft Teams for 2 internal videoconferences or telephonic conferences?</b> 3 A. Yes, like I said, I use Teams in 4 addition to others. 5 <b>Q. Okay. Do you use Microsoft Teams for 6 chats?</b> 7 A. I will use team -- the chat feature at 8 times when I'm in the Teams meeting. 9 <b>Q. Okay. You mentioned a few times now 10 that you use other software as well. What other 11 software do you use?</b> 12 A. I know Skype is one that gets used from 13 time to time. I think Zoom for some external 14 meetings. Typically they're Skype or -- or Teams 15 for internal meetings. 16 <b>Q. Okay. Do you know whether Spire 17 records any of the Teams or Skype meetings that are 18 internal in the company?</b> 19 MR. GORE: I'm going to -- I'm going to 20 object, overbroad, beyond the scope of this 21 deposition notice. If you want to limit it to any 22 of the calls at issue. 23 <b>Q. (By Mr. Howell) You can answer.</b> 24 A. Yeah, I'm not aware if Spire records 25 those conversations.</p>	<p>Page 152</p> <p>1 sort of shared server for storing information 2 related to the winter storm or for this regulatory 3 proceeding? 4 A. I'm not familiar with the structure for 5 how information that's been gathered is stored. 6 <b>Q. Well, fair enough. Who -- who would be 7 the best person to speak to or who would be the 8 person most knowledgeable with regard to how that 9 information is -- is stored or preserved?</b> 10 A. We work with both inside and outside 11 counsel, so since I don't specifically know who's -- 12 who's in charge of that, I would have to follow up 13 to find out. 14 <b>Q. All right. Setting aside what may or 15 may not have been collected for litigation, I just 16 want to have a better understanding of how things 17 are -- operate on a day-to-day basis. You know, 18 with respect to, you know, documents that might be 19 generated in the ordinary course of business related 20 to gas purchases, are those, you know, types of 21 transactions, are they saved or recorded on any 22 particular part of a -- of the Spire system, are 23 they just saved on someone's individual hard drive, 24 are they put onto a shared file site or how else are 25 they maintained within Spire?</b></p>

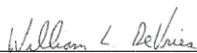
Page 341

1 I don't think that would be proper 30(b)(6)  
 2 corporate representative testimony. I don't think  
 3 we're required to do that.  
 4 MR. BAUER: Okay. Well, my comment  
 5 stands.  
 6 MR. GORE: And with that being said, we  
 7 don't have any questions. So I understand  
 8 Mr. Bauer's point about not saying that this  
 9 30(b)(6) -- or this corporate representative  
 10 deposition is closed, but we don't have any  
 11 questions to ask today. So I guess we're done for  
 12 now.  
 13 VIDEOGRAPHER: Off the record,  
 14 7:04 p.m.  
 15 (WHEREIN, the deposition was concluded  
 16 at 7:04 p.m.)  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

Page 343

1 Alaris Litigation Services  
 2 711 North Eleventh Street  
 3 St. Louis, Missouri 63101  
 4 (314) 644-2191  
 5  
 6 December 14, 2021  
 7 Mr. Gabriel Gore  
 8 Dowd Bennett LLP  
 9 7733 Forsyth Blvd., 19th Floor  
 10 St. Louis, Missouri 63105  
 11 (314) 889-7300  
 12 ggore@dowdclaw.net  
 13  
 14 In Re: Constellation NewEnergy-Gas Division, LLC;  
 15 Symmetry Energy Solutions, LLC;  
 16 and Clearwater Enterprises, LLC, Complainants, vs.  
 17 Spire Missouri, Inc. and its operating unit Spire  
 18 Missouri West, Respondents  
 19  
 20 Dear Mr. Gore:  
 21  
 22 Please find enclosed your copy of the deposition of  
 23 GEORGE E. GODAT taken on December 13, 2021 in the  
 24 above-referenced case. Also enclosed is the  
 25 original signature page and errata sheets.  
 Please have the witness read your copy of the  
 transcript, indicate any changes and/or corrections  
 desired on the errata sheets, and sign the signature  
 page before a notary public.  
 Please return the errata sheets and notarized  
 signature page to Alaris Litigation Services, 711  
 North Eleventh Street, St. Louis, Missouri 63101 for  
 filing prior to trial date.  
 Thank you for your attention to this matter.  
 Sincerely,  
 William L. DeVries, CCR(MO)/RDR/CRR  
 Enclosures

Page 342

1 CERTIFICATE OF REPORTER  
 2  
 3 I, William L. DeVries, a Certified  
 4 Court Reporter (MO), Registered Diplomat Reporter,  
 5 and a Certified Realtime Reporter, do hereby certify  
 6 that the witness whose testimony appears in the  
 7 foregoing deposition was duly sworn by me pursuant  
 8 to Section 492.010 RSMo; that the testimony of said  
 9 witness was taken by me to the best of my ability  
 10 and thereafter reduced to typewriting under my  
 11 direction; that I am neither counsel for, related  
 12 to, nor employed by any of the parties to the action  
 13 in which this deposition was taken, and further that  
 14 I am not a relative or employee of any attorney or  
 15 counsel employed by the parties thereto, nor  
 16 financially or otherwise interested in the outcome  
 17 of the action.  
 18  
 19  
 20   
 21 Certified Court Reporter  
 22 within and for the State of Missouri  
 23  
 24  
 25

Page 344

1 WITNESS ERRATA SHEET  
 2 Witness Name: GEORGE E. GODAT  
 3 Case Name: Constellation NewEnergy-Gas Division,  
 4 LLC; Symmetry Energy Solutions, LLC;  
 5 and Clearwater Enterprises, LLC, Complainants, vs.  
 6 Spire Missouri, Inc. and its operating unit Spire  
 7 Missouri West, Respondents  
 8 Date Taken: December 13, 2021  
 9  
 10 Page # \_\_\_\_\_ Line # \_\_\_\_\_  
 11 Should Read: \_\_\_\_\_  
 12 Reason for Change: \_\_\_\_\_  
 13  
 14 Page # \_\_\_\_\_ Line # \_\_\_\_\_  
 15 Should Read: \_\_\_\_\_  
 16 Reason for Change: \_\_\_\_\_  
 17  
 18 Page # \_\_\_\_\_ Line # \_\_\_\_\_  
 19 Should Read: \_\_\_\_\_  
 20 Reason for Change: \_\_\_\_\_  
 21  
 22 Page # \_\_\_\_\_ Line # \_\_\_\_\_  
 23 Should Read: \_\_\_\_\_  
 24 Reason for Change: \_\_\_\_\_  
 25 Witness Signature: \_\_\_\_\_

86 (Pages 341 to 344)