

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

Symmetry Energy Solutions, LLC,	)	
	)	
Complainant,	)	
	)	
v.	)	
	)	Case No. GC-2021-0316
Spire Missouri Inc.,	)	
	)	
Respondent.	)	

**SPIRE MISSOURI INC.’S ADDITIONAL RESPONSES  
TO SYMMETRY’S SECOND SET OF DATA REQUESTS**

Spire Missouri Inc. (“Spire”) hereby provides the following responses to the Symmetry Energy Solutions, LLC (“Symmetry”) Second Set of Data Requests.

Spire provided objections to these data requests by letter dated January 14, 2022.

The below responses are provided without waiving those objections.

2.1. Produce organizational charts reflecting the relationship, and organizational and personnel overlap, if any, between Spire, Inc., Spire Missouri, Inc. and Spire Marketing, Inc., in effect during the period of February 1-28, 2021.

**RESPONSE:** There is no overlap of employees between Spire Missouri and Spire Marketing. Each business has its own independent President and leadership team. The businesses report up to different Spire Inc. executives. Transactions are subject to the Missouri Public Service Commission affiliate transaction rules.

2.2 Produce documents sufficient to show any formal or informal agreements, rights, obligations, or practice to share, intermingle, purchase, sell or exchange natural gas between or among Spire affiliate entities and units, including but not limited to Spire Marketing, Inc., the Spire MO West System and the Spire MO East System.

**RESPONSE:** There are no informal agreements. Transactions are subject to the Missouri Public Service Commission’s affiliate transaction rules and the Company’s Commission-approved CAM.

2.3 Produce system schematics, process flow diagrams, and other documentation sufficient to show average system flows in the two year period prior to February 11, 2021, and critical pressures on all portions of the system that Spire contends suffered actual or threatened risks to system integrity during the period from February 11, 2021 to February 20, 2021.

**RESPONSE:** See objection.

2.4 Produce Supervisory Control and Data Acquisition (“SCADA”) data, or other data sufficient to show system-wide pressures and flows, for the Spire MO West System for the period from November 1, 2019 to March 31, 2021, including data sufficient to show pressures and flow at all points on the system that Spire contends suffered actual or threatened risks to system integrity during the period from February 11, 2021 to February 20, 2021.

**RESPONSE:** See objection.

2.5 Produce all operator logs, log books, shift notes, or daily operational reports for any individuals who oversaw, or had responsibility for monitoring, any points on the Spire MO West System that Spire contends suffered, or contributed to, threatened or actual risks to system integrity during the period from February 11, 2021 to February 20, 2021.

**RESPONSE:** See objection.

2.6 Produce all policies, procedures, plans, guidelines, or trainings in effect or developed during the period from February 1, 2021 to February 28, 2021 that relate to gas pressure, and actions to be taken in response to drops in pressure, on the Spire MO West System.

**RESPONSE:** See objection.

2.7 Produce all agreements between Spire and Southern Star in effect during the period from February 1, 2021 to February 28, 2021.

**RESPONSE:** These documents are equally available on the SSC EBB. Spire Missouri’s SSC contracts are for max rate transportation and storage service.

2.8 Produce all documents, policies, guidelines, or procedures that placed restrictions or obligations on Spire’s activities with regard to transport or storage capacity on Southern Star during the period from February 1, 2021 to February 28, 2021.

**RESPONSE:** Please see the Southern Star Central tariffs as approved and on file with the Federal Energy Regulatory Commission.

2.9 Produce all agreements between Spire and Panhandle Eastern in effect during the period from February 1, 2021 to February 28, 2021.

**RESPONSE:** These documents are equally available on the PEPL EBB. Spire Missouri's PEPL contracts are for max rate transportation and storage service.

2.10 Produce all agreements between Spire and any third-party relating to the storage of natural gas used and useful in serving the Spire MO West System or any portion thereof, or any other documents, policies, or procedures that place restrictions or obligations on Spire's activities in connection with such storage, in effect during the period from February 1, 2021 to February 28, 2021.

**RESPONSE:** See the response to data requests 2.8 and 2.9.

2.11 Produce any communications between Spire and any third-party, during the period from February 1, 2021 to February 28, 2021, relating to the use of gas in storage, including any communications seeking amendments to, variances from, or relief from storage agreements that were sought or granted.

**RESPONSE:** None.

2.12 Produce all agreements between Spire and customers of Symmetry that received gas from the Spire MO West System during the period from February 1, 2021 to February 28, 2021.

**RESPONSE:** Spire Missouri will produce those agreements it has in its possession. It will attempt to do so by February 1, 2022.

2.13 Produce documentation, including but not limited to Spire MO West System maps, sufficient to demonstrate Spire's supply network for the Spire MO West System during the period from February 1, 2021 to February 28, 2021, including Spire's pipeline network and storage locations.

**RESPONSE:** See objection. Subject to and without waiving the objection, Spire MO West has no on-system gas storage behind its city gates.

2.14 Describe all withdrawals of Spire-owned gas from storage by Spire or any other party, and any purchases of gas in or from storage by Spire, during the periods of November-March 2019, November-March 2020, and November-March 2021, excluding those withdrawals reflected in the documents produced in response to Symmetry Data Request No. 75.

**RESPONSE:** Please refer to Spire Missouri's responses to the CNEG 5<sup>th</sup> Set of Data Requests.

2.15 Provide all documents and communications relating to the transaction between Spire (or a Spire affiliate or unit) and Atmos Energy (or an Atmos Energy affiliate) on February 15, 2021 pursuant to which Spire (or a Spire affiliate or unit) sold Atmos Energy (or an Atmos Energy affiliate) 500,000 dth of natural gas.

**RESPONSE:** Please refer to Spire Missouri's responses to the CNEG 5<sup>th</sup> Set of Data Requests.

2.16 Provide an accounting of all gas that Spire held in storage from January 1, 2021<sup>1</sup> to February 28, 2021, including but not limited to the following:

- i. Identify the physical locations of all storage;
- ii. Describe the maximum rate at which Spire was permitted to withdraw gas from such storage;
- iii. Describe Spire's maximum and minimum contracted gas storage volume;
- iv. Identify the cost, at the time the gas was purchased, of any gas Spire withdrew from storage for each gas day from February 1, 2021 to February 28, 2021;
- v. Identify the costs, if any, associated with the withdrawal of any gas Spire withdrew from storage for each gas day from February 1, 2021 to February 28, 2021;
- vi. Identify the cost of gas Spire injected into storage for each gas day from February 1, 2021 to February 28, 2021;
- vii. Identify all in-ground or in-inventory transfers of storage gas, or transfers of title to storage gas, to or from Spire during the period from February 1, 2021 to February 28, 2021.

**RESPONSE:** Please refer to Spire Missouri's responses to the CNEG 5<sup>th</sup> Set of Data Requests and the Company's to DR 2.7.

2.17 Identify all sales of gas by Spire to any party (including any Spire affiliate or unit), including but not limited to transfers of gas from storage, for the period from February 1, 2021 to February 28, 2021.

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<sup>1</sup> This date is interpreted to be February 1, 2021, given the time periods found in the questions below.

**RESPONSE:** Please refer to Spire Missouri's responses to the CNEG 5<sup>th</sup> Set of Data Requests.

2.18 Produce all documents and communications relating to any sales of gas by Spire to any party (including any Spire affiliate or unit), including but not limited to transfers of gas from storage, for the period from February 1, 2021 to February 28, 2021.

**RESPONSE:** Please refer to Spire Missouri's responses to the CNEG 5<sup>th</sup> Set of Data Requests.

2.19 Produce all documents and communications relating to cash-out or settlement amounts due from, or payable to, Symmetry for the period from November 1, 2020 to the present.

**RESPONSE:** See objection. Subject to and without waiving the objection, Spire Missouri states that these cash out communications are equally available to Symmetry.

2.20 Explain whether Spire treats, and has treated, Symmetry any differently from any other marketers that serve customers on the Spire MO West System from the period of January 1, 2021 to the present, and if so, explain how and why. By way of example, if Spire has provided customers with a list of marketers that serve the Spire MO West system but has not included Symmetry on that list, please explain why.

**RESPONSE:** Spire Missouri has not treated Symmetry any differently. Sometimes customers ask the Company for a list of good performing marketers. Spire Missouri keeps a list of marketers it considers to be good performers and will provide it to those customers upon request. Marketers who did not perform during the winter storm were removed from the list because they are not considered to be good performers.

2.21 Produce all Data Requests served on Spire, and all responses to those Data Requests provided by Spire, including all documents produced, in this Action.

**RESPONSE:** Spire will produce in a mutually agreeable format.

2.22 Produce all Data Requests served by Spire on other parties, and all responses to those Data Requests received, including all documents produced, in this Action.

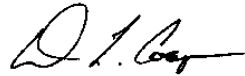
**RESPONSE:** Spire will produce in a mutually agreeable format.

2.23 If any person or entity is entitled to a share of any potential recovery in this case, please produce all relevant agreements and correspondence.

**RESPONSE:** Spire Missouri states that any potential recovery in this case will be governed by the Spire Mo West tariffs approved by and on file with the Missouri Public Service Commission

2.24 Pursuant to 20 CSR 4240-2.090(1) and Rules 56.01(b)(1), 57.01(c)(3) and 58.01(c)(3) of the Missouri Rules of Civil Procedure, produce a log of all responsive materials withheld from production from all of Symmetry's data requests, stating information that will permit others to assess the applicability of the privilege or work product doctrine claimed as grounds for withholding same from production.

**RESPONSE:** None.



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**ATTORNEYS FOR SPIRE MISSOURI INC.**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 21<sup>st</sup> day of January, 2022, to:

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