

In such case, the Companies reserve the right, if necessary, to object on the grounds that more time is needed to respond to all of the DRs, pursuant to the Commission's discovery rules.¹

4. For example, Spire and Laclede believe the DR process will be easier to manage and timely respond, and will be more meaningful if the parties direct their DRs regarding the impact of the acquisition of the Alabama Gas Corporation ("Alagasco") on Missouri customers to actual events that have occurred over the past two years, rather than seeking pro-forma information and analysis that occurred prior to the acquisition and ownership. Based on DRs the Staff has begun to issue, it appears that Staff may seek to explore matters such as Spire's valuation analysis and due diligence reviews prior to entering into a purchase agreement with Energen. These events occurred more than two years ago and have since been superseded by real facts regarding the actual ownership and operation of Alagasco. The Companies believe this process is better served by focusing on actual results over the past two years, rather than speculation that occurred prior to the Alagasco purchase. Nevertheless, the Companies recognize that Staff has been directed to perform this investigation, and that Staff will decide what DRs to send.

5. Finally, Staff asks the Commission to shorten DR response time not only for Spire and its subsidiaries, but also for Sempra and the Alabama and Mississippi utilities it intends to transfer to Spire. Spire and Laclede are committed to cooperating with Staff to help Staff gather the information it needs to prepare a report on whether this relatively small transaction² will have a detrimental impact on Missouri customers.³ However, neither Spire nor Laclede can control

¹ Laclede would note that it is currently responding to earnings complaint DRs, while it tries to prepare for a rate case and the EnergySouth acquisition.

² The acquisition of Mobile Gas and Willmut will increase the Companies' customer base by about 7%.

³ Spire and Laclede reaffirm their position that the Commission does not have jurisdiction over the EnergySouth transaction, and clarify that their cooperation with this investigation does not concede or confer such jurisdiction.

the actions of Sempra and its affiliates, and therefore cannot guarantee any particular level of cooperation by these entities. Spire has not yet ascertained Sempra's willingness to participate in a regulatory matter in a state where, to our knowledge, it has no connection. The Companies can commit to provide their own responses to Sempra-directed questions where feasible, using publicly available information.

6. Based on the foregoing, Spire and Laclede request that the Commission begin the shortened DR response times on the day of the Commission order, and hold the Companies responsible only for their own actions, and not the actions of Sempra and its affiliates.

Respectfully Submitted,

/s/ Mark C. Darrell

Mark C. Darrell, Mo. Bar #57280
Senior Vice President, General Counsel &
Chief Compliance Officer
Spire Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
Telephone: (314) 342-0520
Fax: (314) 421-1979
Email: mark.darrell@spireenergy.com

ATTORNEY FOR SPIRE INC.

/s/ Rick Zucker

Rick Zucker
Missouri Bar No. 49211
Associate General Counsel
Laclede Gas Company
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0533
(314) 421-1979 (Fax)
rick.zucker@thelacledegroup.com

ATTORNEY FOR LACLEDE GAS COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties of record in this case on this 1st day of August, 2016 by United States mail, hand-delivery, email, or facsimile.

/s/ Marcia Spangler