



Spire Missouri Contingency Planning

December 15, 2021

Overview

In compliance with the September 1, 2021 Order Regarding Further Investigation in this matter, Spire Missouri submits this second report on its current contingency plans, ongoing contingency plan development, outreach and coordination, and alternative supply efforts.

Given the recent issuance of a temporary emergency certificate by FERC, Spire Missouri is now halting its contingency planning efforts and will begin focusing on planning for future winters given the continued uncertainty surrounding the long-term operation of Spire STL Pipeline.

Regardless of any future outcome, we will continue to be prepared to maximize the delivery of natural gas, protect lives and property, and care for impacted customers and communities.

In this report, we summarize our contingency planning efforts leading up to the issuance of the temporary emergency certificate as follows:

- Ongoing contingency plan development
 - Tactical planning
 - Outreach and coordination
- Alternative supply update
- Current contingency plans
- Attachments

Ongoing contingency plan development

During the last month, Spire Missouri continued to refine its contingency planning through more detailed operational, resource distribution and volunteer plans. In addition, we conducted significant outreach and coordination with regional public and private entities. The intent of this outreach includes creating awareness and support, as well as ensuring an integrated approach in the event an emergency response is required.

Tactical Planning

Following workshops and related activities reported in November, Spire Missouri transitioned to more tactical planning to ensure we would be ready to initiate a response and support the community. Additional preparations undertaken are described below.

Operational Planning

Building upon the two prior workshops, the Spire Missouri team began detailed, tactical operations planning. This included activities such as developing:

- Situation reporting and daily/hourly operations plans
- Real-time operations tracking
- Defining makeup of incident support and crisis management teams
- Identifying delegation of authority
- Preparation of facilities to support emergency operations
- Identifying and designating critical needs business customers in operations systems

Planning for Cold Weather Resource Distribution and Volunteering

Through the partnership with regional emergency management professionals, Spire Missouri began preparations to procure and distribute warming, comfort and personal care materials to members of the community in need. The temporary emergency certificate was granted in time to avoid investing in the purchase of these materials.

In addition, Spire Missouri began preparations to recruit employee volunteers and have them trained to support Red Cross shelters. This was in addition to planning for volunteers to support distribution of materials to members of the community through points of distribution (PODs). The Company was in the design stage for three drive-through PODs planned for the three affected counties and City of St. Louis.

Outreach and coordination

Elected Officials

Spire Missouri has engaged in continuous outreach with federal, state, county and municipal elected officials since the June 22 court decision. The entire Missouri federal delegation has been kept abreast of the issue and the ongoing efforts of the Spire STL Pipeline to stay operational.

County Executives, their staffs and councils located in the Missouri East region have all been kept informed of the issue and the ongoing efforts of the Spire STL Pipeline to stay operational.

As noted in the November report, Spire Missouri met with United States Department of Energy (DOE) staff to discuss the situation, contingency plans and opportunities where the DOE may be able to help. Of note, the DOE was equally interested in planning toward the winter of 2022-23. We shared examples of potential alternative supply solutions that could be considered as part of ongoing contingency planning.

Regional Emergency Management Partners

Spire Missouri's crisis management personnel continued to meet twice weekly with regional emergency management partners. During this time, Spire Missouri provided information to support development and release of the St. Louis Regional Response Plan that would have been activated if residential customers had lost gas service.

Community Agency Coordination

With one month before the potential expiration of the Pipeline certificate, Spire Missouri began more extensive coordination with several key community groups that would play key roles in our response and community recovery.

Spire Missouri representatives first met with the Executive Director of the American Red Cross of Greater St. Louis (Red Cross) who shared that the role of the Red Cross would be to engage through the jurisdictional Emergency Operations Center to activate shelters throughout the affected community. The Red Cross director clarified that if outages result in a humanitarian crisis, Red Cross will activate and engage resources and volunteers locally, regionally, and nationally as needed to provide emergency sheltering.

Spire Missouri representatives met twice with the Chief Administrative Officer and Chief Impact Officer of the United Way of Greater St. Louis. The second meeting included their Volunteer Center leadership team. These meetings identified opportunities for integration and support. These included United Way 2-1-1 for disaster assistance intake, securing volunteers for distribution of warming, comfort, and personal care items to the community, engaging other organizations throughout the region for specific community support.

Just two days before the FERC granted Spire STL Pipeline's request for a new temporary emergency certificate, Spire Missouri representatives met with members of a diverse group of ten Community Organizations Active in Disasters (COADs) along with the Red Cross, United Way and regional and state Emergency Management and Health Department representatives. Examples of COADs represented were Ozark Food Pantry, BJC Behavioral Health, and Lutheran Disaster Response. Spire Missouri shared a background of the situation, potential scenarios, and key elements of our customer support plan during a response and recovery. COADs asked clarifying questions and identified opportunities to support response and recovery.

Mutual Assistance Planning with the American Gas Association

Spire Missouri representatives held meetings with the Southern Gas Association to discuss the mutual aid process and prepared the documentation required to seek mutual aid assistance. Initial communication to mutual aid companies was being prepared for delivery on Dec. 13 had we not received the temporary emergency certificate. Once this communication was sent, we were going to have individual meetings with each company that had agreed to assist.

FERC

Spire Missouri has continued to monitor the Spire STL Pipeline docket. On Friday, December 3, FERC issued a temporary certificate to allow Spire STL Pipeline to operate until a decision is made on the permanent certificate.

Transportation Customers

Spire Missouri business development representatives continue to keep transportation customers updated on the issue and the ongoing efforts of the Spire STL Pipeline to stay operational.

Firm Customers

Spire Missouri has been diligently complying with the November 18 Order in this docket regarding its customer communications. This includes providing a draft customer letter and public service announcement scripts to Staff on November 19, sending the required customer letter via email as agreed upon on December 1. Upon receipt of the new temporary certificate on December 3, Spire Missouri sent another notification letter to all active customers and pending service agreements via email on the same day. On December 8, Spire Missouri provided Staff with a copy of all communications to customers regarding the Spire STL Pipeline situation, in compliance with the November 18 Order. Discovery is ongoing to assist Staff in its investigation.

Alternate supply update

Spire Missouri has continued to monitor and work on alternative supply since the last report. Specifically, Spire Missouri continued to pursue the reestablishment of the ability to vaporize propane at the Catalan facility and also continued discussions with an LNG service provider. The Company has now allowed its option on LNG injection equipment to lapse. The Spire NGL team successfully pressure tested the transfer line, but all other propane related efforts will be halted for the time being. Given the fact that temporary emergency certificate has now been issued, Spire Missouri will begin focusing on future winter planning given the uncertainty with the permanent certificate for Spire STL Pipeline.

Current contingency plans

Spire will use three specific plans to manage any potential emergencies during this winter season. These plans were included as attachments provided in the November 15 report.

Attachments

FERC Temporary Emergency Certificate Order

Customer communication