

Rick Zucker
Attorney-at-Law

Zucker Law LLC
14412 White Pine Ridge Lane
Chesterfield, Missouri 63017
314-575-5557
zuckerlaw21@gmail.com

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VIA ELECTRONIC MAIL
opcservice@ded.mo.gov

Office of Public Counsel
200 Madison Street
Jefferson City, MO 65101

Re: GO-2018-0309 and 0310; Objection to DRs 8503, 8505-06, 8511, and 8514

Ladies and Gentlemen:

Spire Missouri Inc. ("Spire") received DRs 8501-8516 from OPC on July 11, 2018 for both Spire East and Spire West. Spire objects to the five DRs referenced above for the reasons set forth below.

DR 8503

For relocations claimed to be ISRS qualifying, specify the entity and provide all documentation that required each relocation on behalf of the United States, the State of Missouri, or political subdivision of the State of Missouri, or other entity with eminent domain power, including, but not limited to, all Missouri Highways and Transportation Commission Utility Agreements.

Objection: Since there are well over 100 of these cases, it is overly broad and unduly burdensome to provide all documentation on all of these projects. Notwithstanding this objection, Spire is willing to provide documentation for a sampling of relocation projects.

DR 8505

Provide any and all documentation demonstrating the pipe being replaced is in a worn out or deteriorated condition

Objection: This request is also overly broad and unduly burdensome because it seeks any and all documentation on all of the pipe being replaced. Notwithstanding this objection, Spire states that, other than relocations, most of the replacements were performed as part of Commission mandated replacement programs. This is precisely the type of work contemplated by the ISRS Statute. We have long held that the pipes subject to these mandates are by definition worn out or in deteriorated condition.

OPC Exhibit No. 206
Date 8/27/18 Reporter JMB
File No. GO-2016-0352+0333
GO-2017-0201+0202
GO-2018-0309+0310

DR 8506

Provide copies of any and all testing or other analysis related to ID and OD of the pipe that was ‘renewed’ and claimed as ISRS qualifying.

Objection: Spire objects to this DR as being vague and unclear. Spire is unable to respond to this DR.

DR 8511

Provide all documents demonstrating that Spire East and Spire West are in compliance with all PHMSA requirements.

Objection: Spire objects to this DR because it is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. This question is in the nature of a safety audit, which is not relevant to an ISRS case. The ISRS statute provides for a determination of whether costs incurred in an ISRS request are ISRS-eligible. Whether or not Spire is generally complying with PHMSA requirements is not germane to an ISRS case.

DR 8514

Please provide for Spire East and Spire West if any sub-section of each of the ISRS projects fall under in 4 CSR 240-40.030(15)(D)1.

Objection: This question is overly broad, unduly burdensome, vague, and not reasonably calculated to lead to the discovery of admissible evidence. This DR seeks to have Spire separate ISRS work under its cast iron replacement program by priority. While the issue of ISRS eligibility is relevant, the priority of ISRS-eligible work is not relevant. This information is not readily available, so Spire would have to review each project to see whether it was priority 1 or priority 2. Further, it is not clear what ‘sub-section’ means; it would be burdensome and oppressive to require Spire to break down each project for the purpose of identifying the priority of the work being done.

Sincerely,

/s/ Rick Zucker

cc: Glenn Buck
Eric Lobser
Wes Selinger
Lew Keathley
David Abernathy