

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

In the Matter of Spire Missouri Inc. d/b/a Spire's)	
Request for Authority to Implement a General)	
Rate Increase for Natural Gas Service Provided)	File No. GR-2025-0107
In the Company's Missouri Service Areas)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company"), and requests that the Missouri Public Service Commission ("Commission") issue a protective order, stating the following:

1. Confidentiality before the Commission is governed by both statute and rule. State agency parties and their employees are covered by statutory confidentiality requirements under § 386.480, RSMo. Additionally, the Commission has promulgated its own specific confidentiality rule, 20 CSR 4240-2.135.

2. Under the Commission's rule, parties disclosing confidential information may designate information as such,¹ and may also choose to request a protective order.² Parties may also designate information as "highly confidential" but must request such greater protection from the Commission.³ In requesting such greater protection, the disclosing party must explain (i) what information must be protected, (ii) the harm to the disclosing entity or the public that might result from disclosure of the information, and (iii) how the information may be disclosed while protecting the interests of the disclosing entity and the public.

3. Confidential and highly confidential information is disclosed to state agency parties and their employees pursuant to the statutory confidentiality requirements. Confidential

¹ 20 CSR 4240-2.135(2) and (5).

² 20 CSR 4240-2.135(3).

³ 20 CSR 4240-2.135(4).

and highly confidential information may also be disclosed to attorneys of record for non-state parties, which then may be shared with a non-state employee and outside expert after such employee or expert file a signed certification that he or she reviewed and will comply with the requirements of the Commission's confidentiality rule.⁴

4. Spire Missouri requests the order of protection to designate information as highly confidential, which it is currently providing as part of the discovery process. The information that Spire Missouri seeks to designate as highly confidential is Spire Inc. board of director materials. These materials contain highly sensitive, non-public information including, but not limited to, information related to corporate strategy, forecasts, valuations, and actual or potential acquisitions and divestitures. Public disclosure of this information would result in economic and competitive harm to Spire Inc., could violate selective disclosure regulations of the United States Securities and Exchange Commission, and would impair the ability of Spire Inc. and its subsidiaries to manage its regulated and non-regulated businesses.

5. At this time, the sole party requesting this information is the Office of Public Counsel. Under the requested order of protection, the Company will disclose certain information to the Office of Public Counsel, which is covered by the statutory confidentiality requirements. Upon reasonable request, the Company will also disclose this information to any other state agency party, and to the attorney of record of any non-state party if such information is relevant to any position advanced by such non-state party in this proceeding. If disclosed to the attorney of record of any non-state party, such information may only be shared with non-state party employees or outside experts if the aforementioned certification requirement is satisfied.

WHEREFORE, Spire Missouri respectfully requests that the Commission issue a

⁴ 20 CSR 4240-2.135(6) and (7).

protective order consistent with this motion and order any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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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 either by mail or electronic mail to all parties of record on this 21st day of May, 2025.

/s/ J. Antonio Arias

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