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November 10, 2025

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VIA ELECTRONIC MAIL
and Hand Delivery

David F. Jones, Chairman
c/o Ectory Lawless
Tennessee Public Utility Commission
502 Deaderick Street, Fourth Floor
Nashville, Tennessee 37243

**Re: Application of Piedmont Natural Gas Company, Inc. and Spire
Tennessee Inc. for Approval of a Transfer of Authority to
Provide Utility Services Pursuant to T.C.A § 65-4-113 and
Related Authorizations
Docket No. 25-00074**

Dear Chairman Jones,

Pursuant to the Joint Procedural Schedule, enclosed for filing please find Spire Tennessee Inc.'s responses to the Consumer Advocate Division's *Second Discovery Requests* in the above-referenced docket. In addition to the tabbed and bound copy of the responses, you will find four flash drives, two of which contain all public responses and attachments in native format and two flash drives which contain the confidential responses and attachments to be filed under seal.

Some of the materials provided are designated as the confidential and proprietary trade secrets of Spire. Therefore, Spire respectfully requests that the Tennessee Public Utility Commission treat those materials in a manner consistent with that designation.

A PDF of the public responses is also being filed today by way of email to the Tennessee Public Utility Commission docket manager, Ectory Lawless. Please file the original and provide a "filed" stamped copy of the same via our office courier.

November 10, 2025

Page 2

If you have any questions regarding these responses, you may reach me at the number shown above.

Sincerely yours,

HOLLAND & KNIGHT LLP



Paul S. Davidson
Equity Partner

PSD:jv

Enclosures

cc: Kelly Cashman-Grams
Michelle Mairs
Cole McCormick
David Foster
Victoria B. Glover
Vance L. Broemel
Eddie Davidson
Matt Aplington
David Yonce
James H. Jeffries IV
Brian L. Franklin
Charlotte A. Mitchell
Mason E. Maney
Henry M. Walker

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the attached was served via electronic mail upon the following:

Victoria B. Glover
Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
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Shilina B. Brown
Senior Assistant Attorney General
Office of the Tennessee Attorney General
Consumer Advocate Division
P.O. Box 20207
Nashville, Tennessee 37202-0207
Email: Shilina.Brown@ag.tn.gov

This, the 10th day of November, 2025.

/s/ Paul S. Davidson
Paul S. Davidson

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

- 2-1.** Integration. Refer to Spire's Response to Consumer Advocate DR No. 1-69 in this Docket. Provide a comprehensive explanation of the role played by Spire's Chief Administrative Officer and its Chief Customer and Information Officer in the integration efforts of Spire's acquisition of (a) Alagasco and (b) Missouri Gas Energy.

RESPONSE:

Ryan Hyman, Spire's Chief Information Officer, led the successful system integrations of both Alagasco and Missouri Gas Energy. This included application configuration, data migration for all supporting systems (Customer, Work Management, Payroll, GIS, Finance), and change management for employees and customers.

Courtney Vomund, Spire's Chief Administrative Officer, began working at Spire in 2015 after the Alagasco and Missouri Gas Energy acquisitions had been completed. However, after joining the Company, she was heavily involved in the human resources integration of Mobile Gas and Willmut Gas, as well as Spire's midstream acquisitions, such as Spire Storage West, Spire Storage Salt Plains, and MoGas Pipeline. She also completed a number of projects to further integrate Alagasco and Missouri Gas Energy policies and employee benefit plans.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-2. Integration. Provide a copy of any contracts entered between Spire and third parties to assist in any way with the effort to integrate Piedmont into the Spire organization. Provide a copy of all status updates, and initial summaries provided by the integration vendor(s) received to date.

RESPONSE:

Please see the <CA DR 2.2 **CONFIDENTIAL** Attachments> folder provided herewith.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-2 Attachments

Confidential Attachments Filed Under Seal

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-3. Accounting. Confirm that Spire intends to maximize the tax deduction known as the “Repair Deduction” under Section 168 of the IRS tax code. If this is not confirmed, identify the factors the Company will utilize to optimize this tax deduction.

RESPONSE:

Spire expects to make the natural gas safe harbor election for eligible property. This election to treat eligible property as deductible repairs is anticipated to be made with the filing of the initial tax return for the entity.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

Response provided by Spire Tennessee Inc. on November 10, 2025.

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-4. Due Diligence. Refer to Spire's Response to Consumer Advocate DR No. 1-1 and CONFIDENTIAL Response to DR No. 1-62. Provide the evidence Spire relied upon to assure itself of the independence of outside parties hired by Duke to provide an analysis of the Piedmont system in support of its sale of Tennessee properties in making its bid for Piedmont.

RESPONSE:

In conducting its due diligence, Spire relied primarily on the independent assessments performed by its own internal employees with subject matter expertise in each functional area of utility operations, gained over decades of industry experience. To the extent Spire utilized information prepared by third parties retained by Duke for purposes of the transaction, Spire was comfortable doing so based primarily upon the history, reputation and size of the entities performing the analysis.

By way of example, the Quality of Earnings Report and Entanglements Report were prepared by PWC, one of the four largest independent accounting firms in the world (often referred to as "Big 4"). PWC operates in approximately 150 countries and employs more than 350,000 professionals. In the United States, its public company audit work is subject to review by the Public Company Accounting Oversight Board.

Similarly, the Independent Engineer's Report and Independent Market Consultant's Report were each prepared by Leidos, a publicly traded company with approximately 48,000 employees across 40 countries, and whose \$16B in annual revenue qualifies it as an S&P 500 component company. It was formerly part of SAIC and Lockheed Martin.

Organizations of the size, scope, and revenue of PWC and Leidos are very unlikely to allow their work product to be influenced by an individual customer for any particular engagement.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-5. Due Diligence. Refer to Spire's Response to Consumer Advocate DR No. 1-1. Provide a clarifying explanation of to what extent the BMO model referenced in this response relied upon the model initially prepared by Duke. Confirm the Duke model referenced within the response is the same as that Confidential model provided in Piedmont Response to Consumer Advocate DR No. 1-7.

Clarification:

2-5. Due Diligence. Identify and explain any differences between the model and assumptions used by Duke in its analysis and the model and assumptions used by Spire in its evaluation supporting the bid to acquire the Piedmont-Tennessee service territory.

a. Provide copies and assumptions of all scenarios and cases that Spire conducted in its review.

RESPONSE TO CLARIFICATION:

Spire's model left Duke's operating and capital plan assumptions substantially unchanged and focused on assessing the impact of the acquisition to Spire Inc. For example, transaction costs were included at the Spire Inc. level. Any changes to the operating model have effectively already been disclosed through testimony and other data requests. As an example, the operating company interest rate assumption was adjusted slightly upward due to more recent market conditions.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-6. Capital Expenditures. Reconcile the capital expenditure budget provided in Spire's CONFIDENTIAL Response to Consumer Advocate DR No. 1-62, with the Piedmont Capital Budget provided in Piedmont's Response to Consumer Advocate DR No. 1-2. For this response, provide the following:

- a. Overview of the types of projects that Spire anticipates completing that are not envisioned in the Piedmont capital budget;
- b. What metrics or evaluation criteria should regulators use to assess the reasonableness and necessity of capital expenditure levels that exceed those set out in Piedmont's Response to Consumer Advocate DR No. 1-2;
- c. Provide the number values for each capital expenditure category represented in the graph contained in Spire's Confidential Response to Consumer Advocate DR No. 1-62;
- d. Regarding the forecasted spending for new business, provide the justification for the level of forecasted spending considering the historic level of customer growth; and
- e. Considering the level of capital expenditures forecasted, as necessary, to serve new business, should the Commission consider modification to the Contribution in Aid of Construction tariff provisions to protect the affordability of service to legacy customers?

RESPONSE:

- a. As indicated in our initial response to CAD DR 1-62, Duke/Piedmont management has noted that Piedmont Tennessee has been capital constrained in recent years, and that this was expected to become more of an issue in future years. The Direct Testimony of Mike Switzer reiterates this as well where he states, "we have had to limit capital available to the Tennessee jurisdiction because of needs in other areas of Duke Energy in order to sustain funding for our capital plan." The capital forecast that Spire put forth as part of the Company's response to CAD DR 1-62 was based on a third-party consultant Piedmont brought in to evaluate the Nashville system for the sale process. The consultant examined data, had conversations with various Piedmont/Duke personnel, and worked from the perspective of a capital budget for Piedmont Tennessee in the absence of capital

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE’S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

constraints. With sufficient capital availability, additional funds can be dedicated to support ongoing system reliability, safety, and efficient performance by focusing on reducing the inventory of higher-risk assets via pipeline replacements and pressure upgrades via capacity expansion of metering and regulating stations, pipeline expansions, looping, or additional feeds.

- b. The evaluation criteria to assess the reasonableness and necessity of capital expenditures should be consistent with the methodology and approach that is currently used. As noted in part (a), the gap between the two data responses is due to the Duke/Piedmont response assuming capital constraints in the upcoming years. Spire intends to continue making prudent investments into the Nashville system to support ongoing system reliability, safety, and efficient performance as well as to bring new customers onto the system where it is economically feasible to do so.
- c. The table below represents each capital expenditure category initially included in response to DR 1-62. This forecast is still in the process of being finalized and is subject to change as we continue our integration efforts. A slightly revised capex plan is expected to be included in Spire Inc.’s earnings materials, to be released on November 14, 2025.

	2026	2027	2028	2029	2030
New Business	\$64	\$66	\$68	\$70	\$72
Maintenance / Integrity	57	57	61	62	63
System Improvements	43	26	28	24	25
AMI	8	6	5	5	5
IT	2	2	2	2	3
Facilities	0	0	0	0	0
LNG	2	2	2	1	1
RNG	20	19	-	-	-
Other	0	0	0	0	0
Total	\$196	\$180	\$167	\$165	\$169

- d. See the response to part (a) for discussion around the general approach the third-party consultant took when preparing the new business capital forecast Spire provided in its response to CAD DR 1-62. The new business capital forecast includes capital investment associated with mains, service lines, and other infrastructure required to serve new customers. The consultant relied on the assumption that there will be consistent demand for service line installations with customer growth of approximately 1% annually over the forecast period which is consistent with the recent historical growth.

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

- e. Piedmont's existing Tennessee Service Regulations, as previously approved by the Commission, adequately and appropriately protects its existing customers by requiring that requests granted for new or changed service, as well as new main and service line extensions for the provision of gas service to new customers, be economically feasible by providing the Company a reasonable rate of return. Furthermore, economic feasibility is clearly, adequately and appropriately defined in Piedmont's Tennessee Service Regulations as being achieved when the total annual net revenue to be obtained from the customer(s) provides a rate of return that is equal to or greater than the Company's authorized overall cost of capital. This standard remains sufficient to protect existing customers.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-7. New Business. Refer to Piedmont's Response to Consumer Advocate DR No. 1-8.

Considering this response, provide an overview of any plans or concepts that Spire has to expand the footprint of natural gas beyond the normal organic customer growth inside the existing Piedmont service territory.

RESPONSE:

To date, Spire does not have any specific plans or concepts to expand beyond the normal organic customer growth inside the existing Piedmont service territory. With that said, it is Spire's understanding that Piedmont has been capital constrained, which could have limited its willingness to fund future growth opportunities. Spire does not have these same capital constraints and intends to serve prudent growth opportunities.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-8. Accounting. Refer to Spire's Response to Consumer Advocate DR No. 1-13 and respond to the following:

- a. How would the hypothetical "other efficiencies gained in the interim" be quantified?
- b. Specifically, how would the Company intend to calculate the benefit of the step-up in tax basis? What baseline level of ADIT would be suggested to determine the purported ADIT implications of the transaction?

RESPONSE:

- a. Spire is still early in the integration process and has not identified or quantified specific efficiencies. However, as referenced in the Company's response to DR 2-11, Spire's view is that costs should be looked at as a whole, because while some costs could increase, other costs may decrease. It's also possible that increased costs, in the short-run, may lead to cost savings in the long-run. Spire has taken the position that the cost it will incur will be consistent with what Piedmont's have been, and potentially less than what an alternative buyer may be able to offer given Spire's scale and gas-only focus.
- b. Spire is still reviewing and assessing impacts of the transaction and implications of the removal of the ADIT balance and the tax basis step-up to fair market value.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-9. Employee. Refer to Spire's Response to Consumer Advocate DR No. 1-37. Provide a copy of any information provided to Piedmont employees at the referenced October 9, 2025, meeting.

RESPONSE:

On October 9th, members of the Spire leadership team met with all Piedmont Tennessee employees and discussed the acquisition and answered questions from employees. No written information was provided to Piedmont employees at the meeting.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-10. ARM. Regarding Spire's request to continue operating unabated with Piedmont's ARM filing, would any Piedmont services be required to assemble and complete the necessary filings in 2026? Would the work involved in preparing such a filing involve Duke employees whose costs would be incurred by Spire-Tennessee under the Transition Services Agreement?

RESPONSE:

Yes. Piedmont will assist with the 2026 ARM filing under the Transition Services Agreement.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

- 2-11. Operating Expenses. Throughout the discovery responses Spire has taken the position that the underlying operational costs resulting from this transaction should not be assessed until some future regulatory proceeding and it has indicated that the prudence can be evaluated at that time. Respond to the following:
- a. Hypothetically, is it possible that a cost could be prudently incurred, but be higher than what otherwise would occur absent this transaction?
 - b. Is it the Company's position that, to the extent costs increase because of this transaction, such increases may be quantified in future regulatory proceedings?
 - i. If this is the Company's position, provide the specific benchmarks and criteria that should be in place to quantify such increased costs from this transaction.

RESPONSE:

- a. Hypothetically, yes. As stated in previous responses, Duke/Piedmont made a decision to sell this business and therefore, Spire views that as a foregone conclusion. The fundamental question in this proceeding, as defined by T.C.A. 65-4-113, is whether or not Spire is a suitable purchaser for the assets. Spire has taken the position that the cost it will incur will be consistent with what Piedmont's have been, and potentially less than what an alternative buyer may be able to offer given Spire's scale and gas-only focus.
- b. It will be difficult to specifically quantify cost increases because of this transaction in future regulatory proceedings, but it's possible it can be done depending on the specific cost increase in question. Spire's view is that costs should be looked at as a whole because while some costs could increase, other costs may decrease. It's also possible that increased costs in the short-run may lead to cost savings in the long-run.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-12. Gas Supply. Will all Piedmont gas supply personnel be transferred to Spire Shared Services?

RESPONSE:

Piedmont has one conveying gas supply employee that will join the Spire Gas Supply team. It is our understanding that this individual will handle all of the gas supply-related functions for Piedmont's Tennessee operations.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-13. Gas Supply. Has Spire determined if the contracts that will be transferred are adequate to meet current and future demand? If not, provide a list of issues that need to be addressed.

RESPONSE:

Spire believes that the contracts to be transferred along with city-gate delivered contracts are adequate to meet current and near-term future demand.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-14. Gas Supply. Provide a breakdown of the capital expenditure forecast by the new business categories of: New Services; Commercial New Services; Pool Revenue Producing; Pool Revenue Producing – Off-Cycle; LNG Projects; RNG Projects; and Total of Other Specific Projects. Also explain what would be included in both pool revenue producing categories.

RESPONSE:

N/A per the clarification letter received November 4, 2025.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-15. Gas Supply. Does Spire have a Gas Supply Plan for post-acquisition? If so, provide a copy of such Gas Supply Plan.

RESPONSE:

Spire will be assuming all existing gas supply contracts, including the Asset Management Agreement, from Piedmont for the Tennessee operations. It is our understanding that Piedmont develops and presents to the TPUC and CAD staff a three-year gas-look-ahead gas supply plan on an annual basis for Tennessee. While we are still in the early stages of integration, it is expected that Spire will inherit that plan and update it, as needed, on an ongoing basis.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-16. Union. Has Spire identified any changes to Union agreements that will need to be negotiated post-transaction, or will they assume existing contracts?

RESPONSE:

Spire will be assuming the existing collective bargaining agreement, but will work with Piedmont/Duke to bargain any items in the agreement that must be updated due to the change in ownership (e.g., replacing names of policies to reflect Spire policies versus Piedmont/Duke policies, updating references to Piedmont/Duke systems, updating references to benefits to reflect Spire benefits, etc.).

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-17. Union. Depending on the structure and conditions within the agreements, will all personnel maintain their existing seniority levels for their existing obligations under the agreements?

RESPONSE:

Yes, all personnel will maintain their existing seniority level for existing obligations under the collective bargaining agreement.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-18. Transition. Are existing systems and software that Spire utilizes for shared service adequate to add Spire-Tennessee properties/data and maintain that information adequately to accommodate appropriate jurisdictional documentation for Tennessee data? Identify any such systems that have been determined not to be compatible with Spire systems. Identify any such systems where compatibility has yet to be determined.

RESPONSE:

Current Spire shared service systems can support Spire-Tennessee data, with no compatibility issues identified so far.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-19. Transition. During the process of transferring data from Piedmont to Spire-Tennessee, which would not be considered on-going operational activities, how will these costs be identified and recorded to ensure these are available for regulatory review prior to any potential recovery from customers? Identify all accounting documentation in place describing how such costs will be identified.

RESPONSE:

After Spire develops and configures the applications necessary to bring online Spire Tennessee's processes, we will transfer selected data from the source (Duke's systems) to target (Spire's systems).

The primary accounting standard governing software implementations and data conversion is ASC 350-40, which addresses internal-use software. This was recently modernized by ASU 2025-06, issued by the FASB in September 2025. Data conversion costs can be split into two categories: 1) software that enables access to or conversion of old data by new systems which may be capitalized,¹ and 2) manual data cleansing and mapping activities, which are to be expensed.²

In both cases, specific projects will be opened to collect these costs by implemented system, so that they may be isolated for reporting and regulatory review.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-20. Shared Services. Has Spire identified whether there are any legacy systems for shared services that will be inadequate and need to be replaced by Spire to accommodate the transition of Piedmont data to Spire, and, if so, how will costs be allocated between Spire's multiple jurisdictions that benefit from these new systems?

RESPONSE:

There are no legacy applications traveling with the acquisition for shared services.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-21. Gas Supply. Will all Tennessee gas supply/gas operations and engineering be physically relocated to Spire? Where will the personnel performing these duties be located?

RESPONSE:

Gas supply has a conveying employee that is currently located in Charlotte that manages the daily responsibilities for Tennessee. This individual will remain in Charlotte.

Gas control is currently located in Charlotte but will transition to Spire's centrally located control room in St. Louis at an appropriate time in the future.

The following engineering positions are conveying with the transaction and will be in Nashville:

- Distribution Project Specialist – 4
- Manager of System Integrity – 1
- System Integrity Technicians – 3
- Gas Integrity Risk Program Manager – 1
- Senior Engineer – 1
- Lead Engineer – 1
- Sr Project Manager – 1

All other engineering positions will either be added at a later time or handled as a shared service out of Missouri or Alabama.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-22. Gas Supply. Indicate the specific gas supply and transportation contracts to be transferred from Piedmont to Spire. Include the expiration date of each contract, purchase volumes, and transportation volumes under each agreement.

RESPONSE:

Please refer to Appendix A of the <CAD DR 2.22 Attachment – Joint Petition for Limited Waiver of Capacity Release Regulations>, filed with FERC, as well as the <CAD DR 2.22 **CONFIDENTIAL** Attachment - Due Diligence Gas Supply Contracts> provided herewith for the due diligence list of gas supply contracts.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-22 Attachment

Attachment Provided Electronically

SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
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DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-22 Attachment

Confidential Attachment Filed Under Seal

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
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DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-23. Cost of Debt. Refer to the Petition at page 7. Provide the interest rate that Spire expects for the bridge loan and include the underlying assumptions supporting the forecasted rate.

RESPONSE:

The bridge loan is not meant for permanent financing and is intended to assure the seller that the closing of the sale could be accomplished without contingency. It is fully committed (i.e., available) but would not necessarily be triggered unless permanent financing required additional time beyond the date of closing. The indebted party, should the bridge be triggered, would be Spire Inc not Spire Tennessee.

Assuming 1-month SOFR as the base: $4\% + 0.10\% + 1.50\% = 5.60\%$ annualized to draw on the bridge loan as of 11/4/25.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

Response provided by Spire Tennessee Inc. on November 10, 2025.

SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-24 Response

Confidential Response Filed Under Seal

SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-25 Response

Confidential Response Filed Under Seal

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-26. Capital Structure. Confirm that during the period that the bridge loan is being utilized, the purchase will be financed with debt. If this is not accurate, explain the financing in detail.

RESPONSE:

The bridge loan is not meant for permanent financing and is intended to assure the seller that the closing of the sale could be accomplished without contingency. It is fully committed (i.e., available) but would not necessarily be triggered unless permanent financing required additional time to close. The indebted party, should the bridge be triggered, would be Spire Inc. not Spire Tennessee. It is not our intent or belief that the bridge will be utilized at all, but if it was, yes, this would be debt financing.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

Response provided by Spire Tennessee Inc. on November 10, 2025.

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-27. Customer Bill. Provide a sample bill for an actual customer for the month of January 2025, with all personal information redacted: name, address, and account number. Subsequent to the integration of Spire-Tennessee billing information into the existing billing system of Spire, will the bill presented to Spire-Tennessee customers contain the same billing components as is currently provided to existing Spire customers, notwithstanding differing rates?

RESPONSE:

See attached sample bills <CAD DR 2.27 Attachment - January 2025 - Alabama RES bill> and <CAD DR 2.27 Attachment - January 2025 - Missouri RES bill> provided herewith. We are still early in our integration efforts and will be utilizing the Transition Services Agreement for a period of time during the transition period from Piedmont to Spire for billing purposes. As we continue integrating Tennessee to Spire's systems, we will be evaluating the bill, including what is presented on the bill and will provide, at a minimum, the same level of detail that is currently being provided.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-27 Attachments

Attachments Provided Electronically

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-28. Capital Budget. Provide the final capital budgets by year for the period 2020 – 2025 for the following jurisdictions:

- a. Spire Missouri West;
- b. Spire Missouri East;
- c. Spire Alabama; and
- d. Spire Mississippi.

The Consumer Advocate is using the term “final capital budget” to mean that budget adopted prior to the beginning of the year in question, and not the one updated as the year unfolds.

RESPONSE:

Please see the <CAD DR 2.29 **CONFIDENTIAL** Attachment - TN Data Request> file provided herewith.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

Response provided by Spire Tennessee Inc. on November 10, 2025.

SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-28 Attachment

Confidential Attachment Filed Under Seal

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DOCKET NO. 25-00074
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DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-29. Capital Expenditures. Provide the actual capital expenditures by year for the period 2020

– 2025 for the following jurisdictions:

- a. Spire Missouri West;
- b. Spire Missouri East;
- c. Spire Alabama; and
- d. Spire Mississippi.

RESPONSE:

Please see the <CAD DR 2.28 **CONFIDENTIAL** Attachment - TN Data Request> provided herewith.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

Response provided by Spire Tennessee Inc. on November 10, 2025.

**SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025**

2-29 Attachment

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DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-30. PHMSA Report. Refer to Spire's Response to Consumer Advocate DR No. 1-10. Confirm that the PHMSA report provided is the Missouri – East report. Provide a copy of the 2024 report for Spire-Missouri West.

RESPONSE:

Confirmed. Please see attached <CAD DR 2.30 Attachment - Missouri West GD_AnnualForm_2024> provided herewith for a copy of Spire-Missouri West.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-30 Attachment

Attachment Provided Electronically

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-31. Corporate Costs. Refer to the *Direct Testimony of David Yonce*, Exhibit <25-00074_D. YONCE EXHIBIT 3 [CONFIDENTIAL]> and specifically, pdf page 36 and respond to the following:

- a. Is the data under the caption [REDACTED] total costs reflective of twelve months' data? Stated differently, is Spire's fiscal year the twelve months ended September. If so, provide the portion of the total costs that were eventually capitalized.
- b. If part (a) is not confirmed, provide data in the format shown for the twelve-month period ending September 2024.
- c. Provide data in this format for the twelve months ended June 30, 2025. Further identify the portion of those costs that were eventually capitalized.
- d. [REDACTED]

RESPONSE:

[REDACTED]

**PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

Response provided by Spire Tennessee Inc. on November 10, 2025.

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-32. Operations. Identify third-party vendors providing operational services to Piedmont-Tennessee. This would include, but not be limited to, vendors providing locate services and construction. For each vendor indicate whether Spire will be able to assume the related contract, or will a new contract be required to be negotiated.

RESPONSE:

For a list of operational contracts that will definitively be transferred from Piedmont to Spire, please see Seller Disclosure Schedule 2.1(j) (Transferred Contracts) of the attached, <CAD DR 2.32 **CONFIDENTIAL** Attachment - Asset Purchase Agreement> provided herewith. For a list of additional operational contracts that may be transferred, please see Seller Disclosure Schedule 5.9 (Material Contracts). Piedmont and Spire are currently working through the integration planning process, which will determine whether additional operational contracts may be assigned to Spire as a whole or in part, replaced with amendments to existing Spire contracts for similar services, or replaced with either new contracts or Spire internal labor.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-32 Attachment

Confidential Attachment Filed Under Seal

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-33. Operations. Has Spire identified any services that are currently being performed by third-party contractors that may be transitioned to Spire-Tennessee employees? If so, identify any such potential services that will be reviewed for such a transition.

RESPONSE:

Spire is still in the early stages of integration efforts and still evaluating all services currently being performed by third-party contractors and company employees. As such, Spire has not identified any services that it intends to transition but will continue to evaluate all services currently being performed by third-party contractors and whether that makes the most sense.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

- 2-34. Corporate Costs. Refer to Spire's Response to Consumer Advocate DR No. 1-20. How will incremental transition costs associated with Information Technology ("IT") (or any other operating, management or financial system) be accounted for in the interim period prior to implementation. For example, assume because of the Spire-Tennessee transaction that a specific IT platform currently used by other Spire business units will require an upgrade and that such an upgrade will be completed on December 31, 2026. Under this scenario, respond to the following for each system identified to-date:
- a. Would the incremental upgrade costs be direct charged to Spire-Tennessee?
 - b. If part (a) is confirmed, how will such incremental costs be determined?
 - c. What accounts will be used to account for the IT upgrades, and will such costs reside at the corporate level of Spire?

RESPONSE:

- a. Spire Tennessee will not be allocated IT platform costs until Spire Tennessee is benefiting from those platforms.
- b. The incremental costs associated with the implementation and conversion for Spire Tennessee will be either directly charged or 100% allocated to Spire Tennessee.
- c. Please see the Company's response to DR 2-19.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

Response provided by Spire Tennessee Inc. on November 10, 2025.

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-35. Transition Costs. Refer to Spire's Response to Consumer Advocate DR No 1-17.

Specifically, exhibit <CAD DR 1.17 CONFIDENTIAL Attachment - IT System Integration Timeline>. Provide a comprehensive explanation of the [REDACTED]

[REDACTED]. Within the response, respond to the following:

- a. Why is this [REDACTED] necessary?
- b. What benefits will be derived from the [REDACTED]
- c. Will [REDACTED] benefit all business units of Spire, or is this [REDACTED] unique to the Piedmont-Tennessee acquisition?
- d. Will [REDACTED] costs be allocated among Spire business units, or will they be direct charged to a particular business unit and if so, which one(s)?

RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

**PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025**

2-36. Operations. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RESPONSE:

[REDACTED]

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-37. Due Diligence. Confirm that Spire did not modify the model prepared by Piedmont, and provided in Piedmont's Response to Consumer Advocate DR No. 1-7, in its due diligence prior to making a bid for Piedmont-Tennessee. If this is not confirmed, provide variations of the initial model, including the assumptions Spire used to create alternative scenarios.

RESPONSE:

Please refer to Spire's response to CAD DR 2-5.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.

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SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-38. Transaction Costs. Has BMO acted as Spire's investment advisor in this transaction?

RESPONSE:

Yes.

Name and title of responsible person: Brittany Mathis, CFO & Controller, Spire Alabama

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PIEDMONT NATURAL GAS COMPANY, INC.
SPIRE TENNESSEE INC.
DOCKET NO. 25-00074
CONSUMER ADVOCATE'S SECOND SET OF DISCOVERY REQUESTS
DATE ISSUED: OCTOBER 24, 2025
DATE DUE: NOVEMBER 10, 2025

2-39. Transaction Costs. Provide the rationale for recovery of transaction costs incurred by Piedmont in 2025 associated with this transaction in a future regulatory proceeding.

RESPONSE:

Spire is not aware of plans by Piedmont to seek recovery of transaction costs in 2025 associated with this transaction.

Name and title of responsible person: David Yonce, Managing Director, Regulatory Affairs

Response provided by Spire Tennessee Inc. on November 10, 2025.