

**IN THE TENNESSEE PUBLIC UTILITY COMMISSION
AT NASHVILLE, TENNESSEE**

IN RE:) Electronically Filed in TPUC Docket Room
) on September 29, 2025 at 1:39 p.m.
APPLICATION OF PIEDMONT)
NATURAL GAS COMPANY, INC. AND)
SPIRE TENNESSEE INC. FOR)
APPROVAL OF A TRANSFER OF) **DOCKET NO. 25-00074**
AUTHORITY TO PROVIDE UTILITY)
SERVICES PURSUANT TO T.C.A. § 65-4-)
113 AND RELATED AUTHORIZATIONS)

**CONSUMER ADVOCATE’S FIRST SET OF DISCOVERY REQUESTS
TO SPIRE**

This First Set of Discovery Requests is hereby served upon Spire (“Spire” or the “Company”), pursuant to Rules 26, 33, 34, and 36 of the Tennessee Rules of Civil Procedure and Tenn. Comp. R. & Reg. 1220-01-02-.11. The Consumer Advocate Division of the Tennessee Office of the Attorney General (“Consumer Advocate”) requests that full and complete responses be provided pursuant to the Tennessee Rules of Civil Procedure. The responses are to be produced at the Office of the Tennessee Attorney General and Reporter, Consumer Advocate Division, John Sevier Building, 500 Dr. Martin L. King Jr. Blvd., Nashville, Tennessee 37243, c/o Victoria B. Glover on or before Friday, October 10, 2025, at 2:00 p.m. CST.

PRELIMINARY MATTERS AND DEFINITIONS

1. **Continuing Request.** These discovery requests are to be considered continuing in nature and are to be supplemented from time to time as information is received by the Company and any of its affiliates which would make a prior response inaccurate, incomplete, or incorrect.

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2. **Clear References.** To the extent that the data or information requested is incorporated or contained in a document, identify the document including page/line number if applicable.

3. **Format of Responses.** Provide all responses in the format in which they were created or maintained, for example, Microsoft Word or Microsoft Excel format with all cells and formulas intact and in working order. If a document (including without limitation a financial or other spreadsheet or work paper) is not created or maintained in Microsoft Excel format, convert the document to Microsoft Excel format or provide the document in a format that enables or permits functionality like or similar to Microsoft Excel (including without limitation the functionality of working cells and formulas), or provide the software program(s) that will enable the Consumer Advocate to audit and analyze the data and information in the same manner as would be enabled or permitted if the document were provided in Microsoft Excel format.

4. **Objections.** If any objections to this discovery are raised based on privilege or immunity, include in your response a complete explanation concerning the privilege or immunity asserted. If you claim a document is privileged, identify the document, and state the basis for the privilege or immunity asserted. If you contend that you are entitled to refuse to fully answer any of this discovery, state the exact legal basis for each such refusal.

5. **Singular/Plural.** The singular shall include the plural, and vice-versa, where appropriate.

6. **Definitions.** As used in this Request:

(a) “You,” “Your,” “Company,” or “Spire” shall mean Spire, and all employees, agents, attorneys, representatives, or any other person acting or purporting to act on its behalf.

(b) “Affiliate” shall mean any entity who, directly or indirectly, is in control of, is controlled by, or is under common control with the Company. For greater

clarification, “control” is the ownership of 20% or more of the shares of stock entitled to vote for the election of directors in the case of a corporation, or 20% or more of the equity interest in the case of any other type of entity, or status as a director or officer of a corporation or limited liability company, or status as a partner of a partnership, or status as an owner of a sole proprietorship, or any other arrangement whereby a person has the power to choose, direct, or manage the board of directors or equivalent governing body, officers, managers, employees, proxies, or agents of another person. In addition, the term “Affiliate” shall mean any entity that directly or indirectly provides management or operational services to the Company or any affiliate (as defined in the preceding sentence) of the Company, or to which the Company provides management or operational services. Further, the payment of money to the Company or receipt by the Company of money from an entity with which the Company has any relationship, other than such payment or receipt, shall include the payor or recipient of such money as an “Affiliate”.

(c) “Communication” shall mean any transmission of information by oral, graphic, written, pictorial or otherwise perceptible means, including but not limited to personal conversations, telephone conversations, letters, memoranda, telegrams, electronic mail, newsletters, recorded or handwritten messages, meetings, and personal conversations, or otherwise.

(d) “Document” shall have the broadest possible meaning under applicable law. “Document” shall mean any medium upon which intelligence or information can be recorded or retrieved, such as any written, printed, typed, drawn, filmed, taped, or recorded medium in any manner, however produced or reproduced, including but not limited to any writing, drawing, graph, chart, form, letter, note, report, electronic mail, memorandum (including memoranda, electronic mail, report, or note of a meeting or communication), work paper, spreadsheet, photograph, videotape, audio tape, computer disk or record, or any other data compilation in any form without limitation, which is in your possession, custody or control. If any such document was, but no longer is, in your possession, custody or control, state what disposition was made of the document and when it was made?

(e) “Person” shall mean any natural person, corporation, firm, company, proprietorship, partnership, business, unincorporated association, or other business or legal entity of any sort whatsoever.

(f) “Identify” with respect to:

- i. Any natural person, means to state the full name, telephone number, email address and the current or last known business address of the person (if no business address or email address is available provide any address known to you) and that person’s relationship, whether business, commercial, professional, or personal with you;

- ii. Any legal person, business entity or association, means to state the full name, the name of your contact person with the entity, all trade name(s), doing business as name(s), telephone number(s), email address(es), and current or last known business address of such person or entity (if no business address is available provide any address known to you);
 - iii. Any document, means to state the type of document (e.g., letter), the title, identify the author, the subject matter, the date the document bears and the date it was written; and
 - iv. Any oral communication, means to state the date when and the place where it was made, identify the person who made it, identify the person or persons who were present or who heard it, and the substance of it.
- (g) “And” and “or” shall be construed conjunctively or disjunctively as necessary to make the discovery request inclusive rather than exclusive.
- (h) “Including” shall be construed to mean including but not limited to.

FIRST SET OF DISCOVERY REQUESTS

1-1. Source & Support. Provide a copy of the model used by Spire to evaluate and support its bid to acquire the Piedmont-Tennessee service territory. The financial model should contain active Excel formulas and identify all assumptions made within the forecast. The model should include, but not be limited to, forecasted Rate Base, Operating Revenue, Operating Expenses, Interest, and Taxes.

RESPONSE:

1-2. Explanation. If Spire did not use a model to evaluate and support its bid to acquire the Piedmont-Tennessee service territory, provide a narrative explanation of how it determined the acquisition price.

RESPONSE:

1-3. Alabama Rate Case Responses. Provide a copy of all interrogatories received and responses provided in Spire-Alabama’s most recent rate case proceeding. Omit the

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attachments provided in that case and only provide the written response to the interrogatory questions from all parties. If a rate case has not been conducted in the jurisdiction, provide an explanation why there has not been a rate case.

RESPONSE:

1-4. Alabama Rate Proceeding Responses. Provide a copy of all interrogatories received and responses provided in Spire-Alabama’s two most recent rate proceedings. This request includes any formula rates or other annual rate adjustment filings that vary from traditional rate cases. Omit the attachments provided in that case and only provide the written response to the interrogatory questions from all parties.

RESPONSE:

1-5. Missouri Rate Case Responses. Provide a copy of all interrogatories received and responses provided in Spire-Missouri’s most recent rate case proceeding. Omit the attachments provided in that case and only provide the written responses to the interrogatory questions from all parties.

RESPONSE:

1-6. Capital Investments. Scott Doyle, CEO of Spire, made the following comment in the Company’s August 5, 2024, earnings call: “The Tennessee business will add an incremental \$900 million to our five-year capital plan for a combined \$4.4 billion of investment opportunities.” Confirm the following:

- a. That \$900 million continues to reflect the current capital budget forecast for Spire-Tennessee; and
- b. That \$900 million is necessary to achieve the Company’s long-term goal of reaching 5-7% annual growth in earnings per share.

If either of these statements is not confirmed, provide the corrected information.

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RESPONSE:

1-7. Capital Investment Projections. Explain how Spire determined that “Tennessee business will add an incremental \$900 million to our five-year capital plan.” Provide the projections and information supporting the estimates.

RESPONSE:

1-8. Rate Base. The Company’s September 2025 Investor Presentation references a Tennessee estimated Rate Base of \$1.6 billion (page 6). Provide the individual Rate Base components comprising this estimate.

RESPONSE:

1-9. Identification. Provide the following regarding the employee turnover occurring after the Company’s acquisition of Alagasco (Spire-Alabama):

- a. Identification of the names and job titles of Alabama-based employees employed by Alagasco immediately before the close of the transaction with Spire. Provide the effective date of this information.
- b. Identification of the names and job titles of Alabama-based employees employed by Alagasco two years after the close of the transaction with Spire. Provide the effective date of this information.

RESPONSE:

1-10. Missouri PHMSA Report. Provide a copy of the 2024 Spire-Missouri’s Pipeline and Hazardous Materials Safety Administration (“PHMSA”) annual report.

RESPONSE:

1-11. Alabama PHMSA Report. Provide a copy of the 2024 Spire-Alabama’s PHMSA annual report.

RESPONSE:

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1-12. Taxes. Confirm or deny the following:

- a. The proposed transaction will be considered taxable;
- b. If part (a) is confirmed, confirm that Piedmont's balance of Accumulated Deferred Income Taxes ("ADIT") will be eliminated in the proposed transaction; and
- c. If parts (a) and (b) above are confirmed, provide a comprehensive explanation identifying why this material aspect of the transaction was not highlighted or otherwise explained in the filing.

RESPONSE:

1-13. Taxes. If (a) and (b) in DR No. 1-12 above are confirmed, explain how a transaction that results in an estimated \$236 million increase in Rate Base is in the public interest. Describe how the other aspects of this transaction will overcome the additional \$236 million cost to current Piedmont customers.

RESPONSE:

1-14. Missouri Loading Rate. Provide the loading rate applied to Spire-Missouri construction costs in 2024. Provide each component of the loading rate, identifying the various costs comprising the employee-related portion of the rate.

RESPONSE:

1-15. Alabama Loading Rate. Provide the loading rate applied to Spire-Alabama construction costs in 2024. Provide each component of the loading rate, identifying the various costs comprising the employee-related portion of the rate.

RESPONSE:

1-16. Technological Compatibility. Provide all internal reports, studies, e-mails, and memorandums which evaluate the compatibility and/or capability of the technology used by Piedmont's existing field operation personnel in comparison with the field operation

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technology used by Spire and its affiliates. This response should include any existing documentation that compares/contrasts the various technologies used by Piedmont-Tennessee and its affiliates and the corresponding technology used by Spire and its affiliates.

RESPONSE:

1-17. Technological Integration. Provide documentation demonstrating that confirmed timelines have been established for the following integration efforts:

- a. Geographic Information Systems (GIS) or similarly named technology;
- b. Technology used to assign work tasks to field operations personnel;
- c. Technology used to track and record operation and maintenance activities;
- d. Technology(ies) used to track/record/monitor utility construction activities;
- e. Technology used to perform the customer billing function; and
- f. Technology used within customer service facilities.

This response should include those established timelines.

RESPONSE:

1-18. Technological Integration. Discuss the equity or fairness implications from a customer perspective for them to incur incremental costs incurred to integrate Spire's technology into the operation of Piedmont's current operation, when similar Piedmont costs have already been incurred and recovered from customers?

RESPONSE:

1-19. Identification. Identify any amounts paid by Spire, Inc. or Spire-Tennessee to J.D. Power and Associates or any of its affiliates in 2024.

RESPONSE:

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1-20. Corporate Cost Allocation. Provide a copy of any documentation prepared by Spire that describes how the corporate cost allocation process for various functions will occur during the time period in which Spire is integrating its systems into the operations of Spire-Tennessee.

RESPONSE:

1-21. Estimated Transition Costs. Provide *pro forma* 2026 and 2027 total Spire budgeted financial statements that forecast estimated transition costs to be paid to Piedmont (and/or Duke Energy) because of this transaction. Provide all the detailed information that exists concerning these forecasted expenses.

RESPONSE:

1-22. Financing. Refer to the Direct Testimony of Brittany Mathis at 6:9-16. She states:

“The remainder of the financing will take place at the Spire holding company level and will consist of some combination of common equity, equity-linked and hybrid securities. Equity will be contributed down to Spire-Tennessee consistent with how Spire manages the capital structures of our other utility operating companies. These utility operating companies have capital structures that consistently have had equity layers in the 50-55% range reflective of risks faced by the operating companies.”

- a. Provide an explanation of the following words and/or phrases as the Company understands them:
 - i. “Equity-linked” securities; and
 - ii. “Hybrid” securities.
- b. Explain in detail how “[e]quity will be contributed down to Spire-Tennessee consistent with how Spire manages the capital structures of our other utility operating companies.”
 - i. Does Spire only contribute equity to its operating companies?
 - ii. Does Spire only allocate equity? If so, how is debt utilized at the holding company?

RESPONSE:

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1-23. Financing. Refer to the Direct Testimony of Brittany Mathis at 8:11-15. Has Spire, or any of its predecessors, had a credit downgrading? If so, provide the downgrading report.

RESPONSE:

1-24. Financing. Refer to the Direct Testimony of Brittany Mathis at 8:17-22. Respond to the following:

- a. Does Spire's \$7.4 billion capital expenditure program include the purchase of Piedmont-Tennessee?
- b. How much of the \$7.4 billion capital expenditures are new capital expenditures in Tennessee?
- c. Provide the model and assumptions supporting the statement "Piedmont's growing Nashville service territory is ripe with opportunities for new business investment".
- d. If not explicitly provided by the model, identify the amount of new business investment and the type of facility that lead the Company to include this statement in the filing.

RESPONSE:

1-25. Customer Affordability. Refer to the Direct Testimony of Brittany Mathis at 8:21-11.

Respond to the following:

- a. Provide an explanation and/or definition of "customer affordability".
- b. What factor(s) does the Company use to determine customer affordability?
 - i. How is this affordability then quantified?
- c. Provide an explanation of how growth impacts customer affordability.
 - i. Does affordability differ between new customers and existing customers? Does growth increase or decrease affordability? Under what conditions?
 - ii. What is the Company's balance between growth and affordability? How does the Company quantitatively compare growth and affordability?

RESPONSE:

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1-26. Short Term Debt. Refer to the Direct Testimony of Brittany Mathis at 9:5 – 10:9. Respond to the following:

- a. Confirm that Spire’s Commercial Paper (“CP”) program is for short-term debt; and
- b. Explain why the Spire Consolidated values are the same as the Spire (Parent Only) CP program values and do not include the Spire-Missouri or Spire-Alabama values?

RESPONSE:

1-27. Financial Implications. Refer to the Direct Testimony of Brittany Mathis at 12:7-10. She states, “Spire’s goal throughout this process is for there to be very limited, if any, financial impact to Tennessee customers as a result of the proposed transaction.” Respond to the following:

- a. Does the Company view financial impact synonymous with rate impact? If not, clarify the meaning of “rate impact” used in this statement; and
- b. If rate impact is synonymous with financial impact in (a), explain in detail how recovery of due diligence costs, legal fees, and transition costs through rates would not have a financial impact on Tennessee customers.

RESPONSE:

1-28. Financial Implications. Confirm or deny that the Joint Application does not contain any analytical data specifically identifying the estimated cost impact of the transaction on Piedmont’s current customers.

RESPONSE:

1-29. Financial Implications. Refer to the Direct Testimony of Brittany Mathis at 12:11-15. She states:

“Current rate trends suggest the interest rate on this debt may be higher than that of the historical debt at Duke Energy/Piedmont. However, that risk is mitigated by the fact that Spire has proposed to adopt Piedmont’s

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existing rates (which are built on Piedmont’s capital structures and debt rates), pending further action by the Commission.”

Respond to the following:

- a. Would Spire propose to utilize its actual cost of debt for rate setting in Tennessee?
- b. If the cost of debt for Spire is higher than what currently exists for Piedmont, would Spire seek to use the higher cost of debt for rate setting?

RESPONSE:

1-30. Financial Implications. Refer to the Direct Testimony of Brittany Mathis at 13:3-9.

Respond to the following:

- a. Explain how the legal fees that compose part of the transaction costs for which Spire does not intend to seek rate recovery for differ from the legal fees relating to required Tennessee regulatory approvals.
 - i. Explain how recovery of due diligence costs and legal fees through rates would not have a financial impact on Tennessee customers.
- b. How will Spire identify the various legal fees involved in this transaction and clearly indicate which of those Spire may seek to recover?

RESPONSE:

1-31. Legal Fees. How are the legal costs incurred by the following firms being assigned

between Piedmont and Spire associated with representation before the Commission:

- a. Holland and Knight, LLP;
- b. McGuire Woods LLP; and
- c. Bradley Arant Boult Cummings.

Provide the underlying rationale for the assignment of costs between Spire and Piedmont associated with each of these vendors.

RESPONSE:

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1-32. Legal Fees. To the extent Spire may seek recovery of legal costs associated with the current transaction for the following firms in this proceeding, provide the monthly costs incurred to date for each of the following:

- a. Holland and Knight, LLP;
- b. McGuire Woods LLP; and
- c. Bradley Arant Boult Cummings.

RESPONSE:

1-33. Benefits/Public Interest. Refer to the Direct Testimony of Joe Hampton at 5:5-7. Is Spire-Tennessee claiming that Piedmont customers will have better service as part of the Spire group than currently exists with Piedmont?

RESPONSE:

1-34. Employee Benefit Costs. Provide a detailed overview of how employee benefit costs will change for the current Piedmont employees acquired in this transaction. This response should include both a comprehensive explanation and a cost analysis comparing the Piedmont employee costs vs. those to be incurred by Spire. For purposes of this analysis, please consider the Commission's policy of incorporating pension plan contributions into the revenue requirement rather than pension expense calculated pursuant to Generally Accepted Accounting Principles ("GAAP").

RESPONSE:

1-35. Goodwill Impairment Test. Provide a copy of the Company's most recent Goodwill Impairment Test calculation in Excel. This test should have with all cell references intact and assumptions identified.

RESPONSE:

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1-36. Goodwill Impairment Test. Has Spire forecasted the outcome of the Goodwill Impairment Test required pursuant to Accounting Standards Codification 350, related to the Spire-Tennessee transaction? If so, provide a copy of the model in excel with all cell references intact.

RESPONSE:

1-37. Communications to Employees. Provide a copy of all information provided to existing Piedmont-Tennessee employees concerning the pending sale to Spire.

RESPONSE:

1-38. Charging Date. For each department identified in Exhibit 3, identify the date such department's costs will be charged (regardless of the methodology) to Spire-Tennessee.

RESPONSE:

1-39. Anticipated Financing. Provide the expected journal entries that will be recorded on the consolidated books of Spire to reflect the anticipated financing of the Spire-Tennessee acquisition. Provide an explanation supporting the financing assumptions incorporated in this response.

RESPONSE:

1-40. Financing. Refer to Exhibit 2 filed with the Direct Testimony of Brittany Mathis and respond to the following:

- a. Confirm that the bridge facility with BMO Capital Markets Corp., does not provide permanent financing for the transaction;
- b. Provide a copy of the BMO agreement; and
- c. What is the maximum duration of the BMO facility?

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1-41. Manufactured Gas Plant. Does Spire or any of its affiliates have former Manufactured Gas Plant (“MGP”) sites or operations in their services territories? If so, respond to the following:

- a. Identify the location of each site.
- b. The estimated liability of each site.
- c. To the extent that it is different from (b) above, identify the estimated cleanup cost.

RESPONSE:

1-42. Installation Costs. Provide existing documentation prepared since January 1, 2024, demonstrating Spire’s efforts to control its installed costs of the following:

- a. Mains; and
- b. Service Lines.

RESPONSE:

1-43. Debt Issuances. Will Spire-Tennessee assets be used for collateral under any existing Spire debt issuances? For purposes of this request, the term Spire would include any Spire consolidated or Spire subsidiary debt offering.

RESPONSE:

1-44. Debt Issuances. Is Spire willing to commit that its Spire-Tennessee assets will not be used for collateral for any future Spire debt offering other than for a debt offering limited to Spire-Tennessee?

RESPONSE:

1-45. Operation Performance Reports. Provide a copy of all of the Key Performance Indicators (“KPI”) used by Spire to measure the performance of its operations, for the period 2020 -

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2024. Provide separate KPIs for the two Missouri divisions, Alabama, and the Gulf properties.

RESPONSE:

1-46. Operating Costs. What safeguards, if any, is Spire offering to ensure its customers that its operating costs will not increase as a result of the proposed transaction?

RESPONSE:

1-47. Financial Forecasting Models. Provide a copy of any financial forecast models prepared by the Company that assume Spire will not be operating under Piedmont's current Annual Rate Review Mechanism ("ARM") after the close of the transaction.

RESPONSE:

1-48. ARM. Discuss and provide analytical support for the level of financial distress, if any, that would occur if Spire were unable to immediately implement Piedmont's ARM after this transaction and if Spire instead submits a general rate case in 2028 seeking an implementation date of new rates as of January 1, 2029. This response should include the impact on Spire's current financial forecast and how the modification would affect its credit metrics, earnings per share growth, and dividend payouts.

RESPONSE:

1-49. Due Diligence. Identify any specific areas of improvement Spire has identified in the areas of Employee Safety, Customer Safety, emergency response time, or the efficiency of capital deployment it has identified from its due diligence review of Piedmont's system and operating model.

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1-50. Regulatory Assets. For any outside service costs incurred by the Company that in any way relate to the acquisition, and which Spire intends to record as regulatory assets, provide the following:

- a. Identification of the costs incurred to date, along with a brief description of services provided; and
- b. A copy of all invoices and communications provided by the vendor to date. This request does not include of work product of outside attorneys.

RESPONSE:

1-51. [REDACTED] Refer to the Petition, Exhibit A, Confidential [REDACTED] [REDACTED] [REDACTED] The referenced table, which purports to contain the [REDACTED] does not contain [REDACTED]. Respond to the following:

- a. Is there a [REDACTED] between [REDACTED] that identifies the costs for each of the [REDACTED] pdf page [REDACTED]?
- b. If part (a) above [REDACTED] provide the [REDACTED] for each [REDACTED] [REDACTED] contained in the [REDACTED] attachment to the [REDACTED] [REDACTED]

RESPONSE:

1-52. [REDACTED] Assume the transaction closes on March 1, 2026. Identify the [REDACTED] for which [REDACTED] may be [REDACTED] assuming all existing [REDACTED].

RESPONSE:

1-53. Performance Measures. How does Spire intend to measure its performance relative to the integration of the operations of Spire-Tennessee into its existing operations? Identify the time horizons and specific key performance indicators that have been established to measure the “success” of the integration for each department and each major technology

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component within Operations (all aspects), Customer Service, Accounting, and Human Resources.

RESPONSE:

1-54. Performance Measures. Provide all supporting documentation to demonstrate the Company's success in integrating Missouri Gas Energy into Spire's operations.

RESPONSE:

1-55. Costs. Provide a copy of all internal documentation created that details how the Company intends to account for (a) Transaction, and (b) Transition Costs.

RESPONSE:

1-56. Costs. Provide proxy journal entries indicating the accounts to be used to account for transition costs associated with this transaction. How will Spire identify the appropriate level of internal labor charges devoted to integration efforts?

RESPONSE:

1-57. Costs. Provide proxy journal entries indicating the accounts to be used to account for costs incurred associated with receiving regulatory approval of this transaction.

RESPONSE:

1-58. Costs. Provide proxy journal entries detailing the accounts used to record all related due diligence costs prior to and up to the time the Company made its final offer to buy the Piedmont-Tennessee assets.

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1-59. Financing. Does Spire, or any of its subsidiaries, have cross-default provisions for its loans, bonds, or notes? Has Spire or any of its subsidiaries utilized cross-default provisions in the past?

RESPONSE:

1-60. Financing. Do Spire's bonds encumber any property, including subsidiary ownership, or its subsidiary property?

RESPONSE:

1-61. Financing. Are there any prohibitions or bond covenants that limit Spire's ability to encumber property?

RESPONSE:

1-62. Capital Budget. Provide Spire's five-year capital budget for its Tennessee operations. Provide as much detailed information as is available, identifying where Spire sees need for system investments, by type of expenditure.

RESPONSE:

1-63. Acquisition Docket Inquiries. Provide a copy of any questions and answers to inquiries received from either the Staff of the Missouri Public Service Commission or the Missouri Office of Public Council relating to Spire's acquisition of Piedmont's Tennessee operations.

RESPONSE:

1-64. Acquisition Docket Inquiries. Provide a copy of any questions and answers to inquiries received from either the staff of the Alabama Public Service Commission or the Alabama

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Attorney General's Office relating to Spire's acquisition of Piedmont's Tennessee operations.

RESPONSE:

1-65. Purchase Price. Provide all documentation in the Company's possession that compares the purchase price paid for the Spire transaction to comparable transactions within the industry that have been completed in the past five (5) years.

RESPONSE:

1-66. Rate Increase Customer Communication. Confirm or deny that Spire notifies its Missouri customers of (i) base rate increases, and (ii) increases associated with capital expenditure riders prior to implementing new rates.

RESPONSE:

1-67. Rate Increase Customer Communication. Confirm or deny that Spire notifies its Alabama customers of (i) base rate increases, and (ii) increases associated with annual formula rates prior to implementing new rates.

RESPONSE:

1-68. Integration Efforts. Refer to the Direct Testimony of Brittany Mathis at 4:19-22. She states that the Company has experience with integration efforts. Identify the job titles of all existing Spire employees that will be involve in the Spire-Tennessee integration effort, at the Manager level and above, their physical work location, and the date they began employment with Spire, or a company acquired by Spire.

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1-69. Integration Efforts. To the extent a working group has been established by Spire to integrate the Piedmont-Tennessee into Spire’s operations, identify the names, job titles, and physical work location of the members of this group.

RESPONSE:

1-70. Explanation. Refer to the Direct Testimony of Brittany Mathis at 14:2-3. She states that “in the future, we expect the cost to serve to be no greater than it is currently for Piedmont customers.” Respond to the following:

- a. Regarding the reference to “in the future” is this referring to the period immediately beginning at the date of the acquisition, or is it referring to a period several years after the acquisition?
- b. Provide any analytical support that exists that supports the referenced conclusion.

RESPONSE:

1-71. Employee Benefits. Provide a table comparing the employee benefits currently provided by Piedmont with those that will be provided to Tennessee employees by Spire. This table should incorporate all existing benefits for both companies.

RESPONSE:

1-72. Income Statement. Provide a 2024 Income Statement for the following entities by FERC

Account:

- a. Spire-Missouri West;
- b. Spire-Missouri East;
- c. Spire-Alabama; and
- d. Spire-Gulf Coast (combined).

RESPONSE:

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1-73. Source and Support. Refer to the Direct Testimony of David Yonce, Confidential Exhibit

4. Provide an explanation and analytical support used in [REDACTED] upon what is identified as “[REDACTED]” and “[REDACTED]”

RESPONSE:

RESPECTFULLY SUBMITTED,



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TPUC Docket No. 25-00074

CA's 1st DR to Piedmont

CERTIFICATE OF SERVICE

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

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This the 29th day of September, 2025.



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