

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Spire STL Pipeline LLC

)

Docket No. CP17-40-___

**AMENDMENT TO APPLICATION OF
SPIRE STL PIPELINE LLC
FOR CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY**

Pursuant to Section 7(c) of the Natural Gas Act (“NGA”), 15 U.S.C. § 717f(c) (2012), and Part 157 of the regulations of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. Part 157 (2017), Spire STL Pipeline LLC (“Spire”) hereby submits this amendment (“Amendment”) to its Application for Certificates of Public Convenience and Necessity submitted on January 26, 2017 in the above-captioned docket (“Certificate Application”). In the Certificate Application, Spire has sought Commission authorizations to construct, acquire, own, and operate a new, approximately 66 mile-long interstate natural gas pipeline system that provides interstate natural gas transportation and transportation-related services from an interconnection with the Rockies Express Pipeline LLC (“REX”) interstate pipeline in Scott County, Illinois, to natural gas markets in eastern Missouri (“Spire STL Pipeline Project” or “Project”).

In this Amendment, Spire is proposing a route alternative for the last segment of its proposed pipeline that it has determined to be superior to its originally proposed route. As originally filed, the last segment of Spire’s Project was to be comprised of an existing pipeline, seven miles in length, that Spire proposed to acquire from its affiliated local gas

distribution company (“LDC”), Laclede Gas Company (“Laclede”). The existing pipeline, known as Line 880, is presently dedicated to local utility service, and Laclede would have required the approval of its state regulator, the Missouri Public Service Commission (“MPSC”), to effectuate the transfer to Spire. As explained herein, Spire has determined that a preferred route for the final segment of its Project is a six-mile greenfield pipeline route in proximity to Line 880 but in a less densely populated area, referred to herein as the North County Extension. The North County Extension had been identified in Spire’s Certificate Application as Minor Alternative 5 in Resource Report 10 in Exhibit F-1 and was the subject of the Commission Staff’s Supplemental Notice of Intent to Prepare an Environmental Assessment for the Proposed Spire STL Pipeline Project and Request for Comments on Environmental Issues (“Supplemental NOI”) issued in this proceeding on March 3, 2017, and for which comments were requested by April 3, 2017.

This Amendment includes a detailed description of the North County Extension, an explanation of the basis for Spire’s conclusion that this is the preferred route for its Project, and a description of its effects, if any, on other aspects of the Certificate Application. This Amendment also includes an updated set of Environmental Resource Reports,¹ with explanatory and marked changes detailing all changes from the Environmental Resource Reports filed with the Certificate Application, and the other exhibits that are affected by the proposed route change. Spire has also included herein

¹ The updated set of Environmental Resource Reports submitted with this Amendment are referred to herein as the April 2017 Resource Reports. For additional information regarding Spire’s presentation of updated information in the Resource Reports, associated maps, and other appendices, see the introductory section of April 2017 Resource Report 1.

responses to comments received in response to the Supplemental NOI,² as well as responses to the Environmental Data Request issued to Spire by the Commission's Staff on March 13, 2017.³

Of note, and as discussed in detail herein, the proposed route change has a very limited effect on the Project as proposed in the Certificate Application. There is no change to the peak design capacity of this new pipeline system, its general configuration, number of receipt and delivery points (while a new metering and regulating ("M&R") station will be added at Chain of Rocks, the previously proposed Laclede/Redman Station will be eliminated), or the substantive terms of the proposed Foundation Shipper Precedent Agreement ("PA") or Firm Transportation Service Agreement ("FTS Agreement"). Although there are changes to the cost components of the Project, the total estimated cost has not changed, and changes to the proposed recourse rates are insignificant. The only changes to Spire's proposed FERC NGA Gas Tariff ("Tariff") included in the Certificate Application are an updated Preliminary Statement to reflect the updated pipeline description (Section 2 of the Tariff) and an updated Statement of Currently Effective Rates for Services which reflects a \$0.0006 decrease in Spire's proposed maximum recourse rate for firm transportation service under Rate Schedule FTS (Section 4 of the Tariff). Because Spire is no longer proposing to acquire Line 880 from Laclede, Spire identifies herein those specific requests for authority and accompanying acquisition-related exhibits that should be withdrawn from the Certificate Application.

² The responses to comments are included in a matrix appended as Appendix 1-K to April 2017 Environmental Resource Report 1.

³ A matrix showing where in the April 2017 Resource Reports the responses to the March 13, 2017 environmental data requests are found at Appendix 1-L to April 2017 Resource Report 1.

I. BACKGROUND

In its Certificate Application, Spire proposed to: (1) construct, own, operate, and maintain approximately 59 miles of greenfield 24-inch-diameter pipeline and appurtenant facilities originating at an interconnection with REX in Scott County, Illinois and extending southward through Greene and Jersey Counties in Illinois and further through St. Charles and St. Louis Counties in Missouri to interconnections with Laclede's LDC system (referred to as the "24-inch pipeline" portion of the Project), and (2) acquire, upon receipt of the necessary state commission approval, and make modifications to Laclede's Line 880 pipeline that extends from the proposed terminus of the 24-inch pipeline to an interconnection with Enable Mississippi River Transmission, LLC ("MRT"). As explained therein, the purpose of the Project is to provide 400,000 dekatherms per day ("Dth/d") of incremental firm pipeline transportation service to the St. Louis metropolitan area and surrounding counties in eastern Missouri. The Project currently has one Foundation Shipper, Laclede, which has subscribed for 350,000 Dth/d of firm transportation service, which is 87.5 percent of the proposed Project capacity.

As Spire noted in the "Alternatives" section of its environmental resource reports (Resource Report 10), it had identified a potential alternative (referred to as Minor Alternative 5) to the Line 880 acquisition, which would involve the construction of approximately six miles of greenfield pipeline, in close proximity to Line 880 but in a less densely populated area, to interconnect Spire's proposed 59-mile 24-inch pipeline to MRT.⁴ Spire provided route and other information for this alternative, and indicated that it was continuing to study the alternative.

⁴ Certificate Application at Resource Report 10, Section 10.4.2.5.

On March 3, 2017, the Commission Staff issued the Supplemental NOI, calling for comments on the alternative route segment referred to herein as the North County Extension to be submitted by April 3, 2017. As of the date of submission of this Amendment, very few comments on the North County Extension route have been received.

II. DESCRIPTION OF ROUTE CHANGE

As Spire informed the Commission and all parties to this proceeding in a letter filed in this docket on March 15, 2017, Spire has determined to make a route change with respect to the final segment of its Project. Specifically, Spire has determined not to proceed with the acquisition and refurbishment of Line 880 and instead to construct the North County Extension, a new 24-inch diameter steel pipeline that will extend approximately six miles from the current terminus of the proposed 59-mile 24-inch pipeline at the Laclede/Lange interconnect in St. Louis County, Missouri, through the northern portion of St. Louis County, and terminate at a new interconnection point with both MRT and Laclede that will replace the existing Laclede-MRT interconnection at Chain of Rocks. The total length of the Project pipeline will be approximately 65 miles (one mile shorter than proposed in the Certificate Application), and no compression will be required. The overall design capacity of the Project will remain 400,000 Dth/d. The Project also includes the construction of three new M&R stations that provide interconnects with (1) REX in Illinois, (2) Laclede in Missouri (the Laclede/Lange Station), and (3) MRT and Laclede in Missouri (the Chain of Rocks Station, with two individual meters referred to as MRT-Chain of Rocks and Laclede-Chain of Rocks).

The Project will continue to have two physical delivery points into Laclede's

LDC system, one at the Laclede/Lange Station (located at the interconnect between the Mainline and the North County Extension) and the other at the Chain of Rocks Station, both of which are located in St. Louis County, Missouri.

Following the reconstruction of the current Chain of Rocks interconnection into a bi-directional station, MRT will, as originally proposed, continue to make physical deliveries at Chain of Rocks with those deliveries received into Spire's facilities at the reconstructed Chain of Rocks Station. Spire will be making physical deliveries into Laclede at Chain of Rocks and, to the extent permitted by MRT, will also make physical or displacement deliveries into MRT.

Spire's adoption of the North County Extension as its preferred route also has the effect of eliminating one of its originally proposed new M&R Stations – its planned construction of the Laclede/Redman Station (which was to be located along Line 880).

III. BASIS FOR THE ROUTE CHANGE

Spire has elected to use the North County Extension in place of Line 880 based on the results of its continued detailed construction and engineering review, further study of the proposed pipeline route and various alternatives, and ongoing stakeholder outreach. As more fully described herein, Spire has determined that the North County Extension is preferred over Line 880 in multiple respects.

First and foremost, Spire has concluded that the construction of a new pipeline segment in lieu of its acquisition and refurbishment of Line 880 for interstate service will be preferable from the standpoint of reliability and supply security for Laclede. Line 880 is currently needed to support Laclede's LDC operations. In order to perform the necessary testing and construction activities with respect to Line 880 to ready it for

interstate service, it would be necessary to take Line 880 out of service during the summer construction months. It was imperative that Line 880 be returned to commercial service by no later than October 1; while this construction schedule was manageable, Spire determined that any unanticipated delays with respect to its refurbishment work might delay or jeopardize this critical path item. Avoidance of the Line 880 acquisition and modification work eliminates any potential negative effect on seasonal supply security to Laclede.

Second, Line 880 is in a more densely populated area of St. Louis County than the North County Extension. The approximately thirty work locations associated with the planned refurbishment would have impacted a larger portion of the local population than the new build alternative. Spire appropriately planned to perform a hydrotest of Line 880 at a pressure level that is consistent with its rating. Because of the unique situation, Spire would have an inconvenience to the local community during the rehabilitation work that is avoided with the new build alternative.

Third, and as noted in the Certificate Application, Line 880 has been in service for over 50 years. While Line 880 has been well-maintained and is compliant with applicable pipeline safety requirements for its current use, a new pipeline offers the following advantages:

- The estimated costs and construction schedule associated with the necessary modifications of Line 880 to make it appropriate for interstate service contained variables that required larger contingencies than for the remaining new build portion of the Project, and thus created potential cost overrun and

scheduling delay concerns that were greater than those anticipated for the North County Extension.

- Given its age, Line 880's service life would be necessarily more limited than that of a new pipeline.
- Spire anticipates that Line 880's ongoing maintenance costs would be higher than those of a new line that is designed, inspected, and tested to meet the current industry standards.

Fourth, compared to the 20-inch Line 880, installation of new, larger (24-inch diameter) pipeline in the North County Extension will improve flexibility and provide efficient and less environmentally impactful expansions in the event of future incremental demand.

IV. ENVIRONMENTAL EFFECTS OF THE AMENDMENT, LANDOWNER NOTIFICATION, AND PUBLIC OUTREACH

The revised Environmental Report included herewith more fully describes the potential environmental impacts of the North County Extension. As demonstrated therein, the environmental impacts associated with adoption of the North County Extension, in lieu of the refurbishment of existing Line 880, are modest and substantially outweighed by the benefits of this alternative route described above. Of note, the vast majority of the Project – the first 59 miles of 24-inch pipeline – is not affected by this change.

While the North County Extension involves more new construction than the originally planned refurbishment of existing Line 880, the North County Extension is located in a significantly less developed area and reduces the overall impact to residential areas as compared to the Line 880 alternative. Furthermore, the Project, as amended

herein, has been designed and will be constructed in a manner that minimizes impacts on landowners, other stakeholders, and the environment while continuing to provide the benefits of new sources of natural gas supply to the St. Louis region, including greater reliability, supply security, and lower prices, as well as the opportunity to reduce or eliminate dependence on an inferior peaking supply. In sum, and as detailed in the April 2017 Environmental Report, the overall environmental impact associated with the construction of the Project, as amended, continues to be minimal and will be mitigated as described in the Certificate Application.

Spire remains committed to working cooperatively with stakeholders to address their concerns and minimize and/or mitigate adverse impacts wherever practicable. As always, Spire's goal is to negotiate mutually acceptable agreements with any impacted landowners or other stakeholders.

With regard to landowner notification and public outreach, Spire has revised the detailed listings of the agencies and stakeholders with whom Spire has consulted in Appendix 1-I of April 2017 Resource Report 1, and Agency and Stakeholder Correspondence in Appendix 1-C of April 2017 Resource Report 1. Furthermore, an updated list of all affected landowners – including owners of properties that are directly affected by the proposed activity, owners of properties that abut the Project or the right-of-way associated with the Project, and any landowners with residences within 50 feet of the proposed construction work area – is provided as Appendix 1-G to the April 2017 Resource Reports. More generally speaking, Spire remains committed to working with all affected parties with regard to the Project, as amended. Details regarding Spire's

efforts to ensure that stakeholders are aware of and informed about the Project as amended are set forth in April 2017 Resource Reports 1 and 8 in Exhibit F-I hereto.

V. COST AND RATE EFFECTS OF THE AMENDMENT

Spire's decision to substitute the North County Extension in place of Line 880 acquisition and refurbishment has the effect of increasing certain estimated capital cost categories of the Project (associated with the additional land acquisition, pipeline construction, and associated materials), while reducing others (including the elimination of construction of the Redman Station). Spire's updated estimated capital costs for the Project are provided in Exhibit K to this Amendment.

In addition to adjusting its cost estimate to reflect the North County Extension (and removal of Line 880 associated costs), Spire has also reflected certain updated cost estimates that include more precise estimates. Specifically, Spire's completion of a market study has allowed it to reduce its estimate of land and right of way costs significantly, which more than offsets the estimated costs of additional land acquisition associated with the North County Extension. Likewise, more refined estimates of pipe costs have partially offset the additional pipeline material costs associated with the North County Extension. Spire has also been able to refine its anticipated timing for incurrence of significant costs and, therefore, reduce total estimated Allowance for Funds Used During Construction ("AFUDC"). While the overall costs in certain categories have increased as the result of the inclusion of the North County Extension, Spire has been able to reduce the size of its contingency estimate from \$21,399,296 to \$17,126,393. The effect of these updated cost estimates, collectively, is to maintain the overall Project cost estimate at its originally filed level of \$220,276,167.

While the overall Project capital cost estimate has not changed, the changes to certain cost items, particularly the decrease in estimated AFUDC, has resulted in a slight change to the Rate Schedule FTS reservation rate compared to the proposed initial rate filed in the Certificate Application. In this Amendment, the proposed initial Rate Schedule FTS monthly reservation rate changes from \$9.1092 to \$9.1086, a reduction of \$0.0006. All other proposed initial rates would remain the same.

Spire submits that the lower contingency estimate proposed in this Amendment (which is lowered from approximately 10 percent to approximately 8 percent of the total Project costs) is reasonable in light of the more mature status of its cost estimates and completion of certain pre-construction analyses and contracting that has provided a higher degree of certainty with respect to various cost categories. Moreover, Spire had required a higher contingency level associated with the anticipated Line 880 modification work, given the uncertainties associated with the results of the planned hydrotesting and other work planned for Line 880 necessary to convert it to interstate service. Those uncertainties were discussed in greater detail above. The elimination of the Line 880 acquisition has thus reduced certain cost contingencies associated with the Project, which counterbalances the costs of the North County Extension's additional new pipeline construction.

Spire notes that the estimated cost of facilities is just that – an estimate – and Spire will be required, under the Commission's regulations,⁵ to file a final cost report showing the actual cost of the facilities and explaining any significant differences from its estimates submitted herein. Further, Spire anticipates that the Commission will,

⁵ 18 C.F.R. § 157.20(c)(3) (2017).

consistent with prior practice, require Spire to file a cost and revenue study at the end of its first three years of actual operation, which will afford both the Commission and interested parties the opportunity to review Spire's actual costs and determine whether further review of Spire's initial recourse rates, as approved in the Commission's certificate order granting Spire authority to construct the Project, is necessary.⁶

VI. LACK OF EFFECT ON PA AND FTS AGREEMENT

As noted above, the change from Line 880 to the North County Extension will not affect the terms of service to be provided by Spire to its Foundation Shipper, Laclede, and Spire confirms that there are no changes to the proposed FTS Agreement with Laclede, for which Spire requested pre-approval of two non-conforming Foundation Shipper terms of service. Spire and Laclede have executed an amendment to the PA, the sole purpose of which is to remove references in that original document to Line 880 (and the need for Laclede to obtain MPSC approval for transfer of Line 880 to Spire). That PA amendment is included in the privileged and confidential Volume IV of this Amendment.

Spire further confirms that there are no changes to its proposed Tariff associated with this Amendment, with the exception of the updated Preliminary Statement description of the pipeline system (to note that, as proposed in this Amendment, it is one mile shorter than originally proposed and will be solely 24-inch pipeline), as well as the slight decrease in the Rate Schedule FTS monthly reservation rate, described in the previous section. Those updated Tariff sections are included, in clean and marked form

⁶ See, e.g., *Rover Pipeline LLC*, 158 FERC ¶ 61,109 at P 82 (2017).

showing changes from the original filed in the Certificate Application, at Exhibit P hereto.

Spire also confirms that its estimate of 0.25 percent for Lost Gas remains appropriate for its system with the North County Extension included in place of Line 880.

VII. WITHDRAWAL OF REQUEST FOR AUTHORIZATIONS RELATED TO LINE 880

In light of Spire’s decision to use the North County Extension in lieu of Line 880 for the last segment of its Project route, Spire is no longer proposing to acquire Line 880 from Laclede and hereby withdraws its request for certificate authority to acquire, repurpose, and operate Line 880 as part of its new interstate pipeline system. Accordingly, Spire requests that the Commission deem withdrawn and disregard Section V.C. (“Acquisition of Line 880”) from its Certificate Application, as well as Exhibits R and S (both of which are acquisition-related exhibits no longer relevant to Spire’s request for certificate authorizations).

VIII. PUBLIC CONVENIENCE AND NECESSITY

Spire submits that the Project, as amended herein, continues to serve the present and future public convenience and necessity and Spire incorporates its demonstration of public convenience and necessity in the Certificate Application by reference. This Amendment does not change the Certificate Application’s demonstration of compliance with the Commission’s 1999 Certificate Policy Statement.⁷

⁷ Certificate Application at 17–27.

IX. EXHIBITS

Spire is filing this Amendment pursuant to Section 157.7 of the Commission's regulations, 18 C.F.R. § 157.7 (2017). Therefore, Spire is submitting only exhibits that have changed since the Certificate Application was filed. Except as noted below, the exhibits filed with the Certificate Application are hereby incorporated by reference.

- Exhibit A -- Articles of Incorporation and Bylaws. Exhibit A was filed with the Certificate Application and is not affected by this Amendment.
- Exhibit B -- State Authorizations. Exhibit B was filed with the Certificate Application and is not affected by this Amendment.
- Exhibit C -- Company Officials. Exhibit C was filed with the Certificate Application and is not affected by this Amendment.
- Exhibit D -- Subsidiaries and Affiliation. Exhibit D was filed with the Certificate Application and is not affected by this Amendment.
- Exhibit E -- Other Pending Applications and Filings. Omitted; there are no other pending applications under Sections 1, 3, 4 or 7 of the NGA filed by Spire which directly and significantly affect the Certificate Application.
- Exhibit F -- Location of Facilities. Attached in Volume II.
- Exhibit F-I -- Environmental Report. Attached in Volume II.
- Exhibit G -- Flow Diagrams Showing Daily Design Capacity and Reflecting Operation With and Without Proposed Facilities Added. Attached in Volume III.
- Exhibit G-I -- Flow Diagrams Reflecting Maximum Capabilities. Attached in Volume III.
- Exhibit G-II -- Flow Diagram Data. Attached in Volume III.
- Exhibit H -- Total Gas Supply Data. Omitted; not applicable.
- Exhibit I -- Market Data. An update to the Exhibit I filed with the Certificate Application is attached in Volume IV.
- Exhibit J -- Federal Authorizations. An updated Exhibit J is attached.

- Exhibit K -- Cost of Facilities. An updated Exhibit K is attached.
- Exhibit L -- Financing. An updated Exhibit L, reflecting Spire's updated AFUDC amount, is attached.
- Exhibit M -- Construction, Operation, and Management. Exhibit M was filed with the Certificate Application and is not affected by this Amendment.
- Exhibit N -- Schedule of Revenues, Expenses and Income. An updated Exhibit N, reflecting Spire's updated AFUDC amount, is attached.
- Exhibit O -- Depreciation and Depletion. Exhibit O was filed with the Certificate Application and is not affected by this Amendment.
- Exhibit P -- Tariff. Exhibits P-1 and P-2 were filed with the Certificate Application and are not affected by this Amendment except for the two updated tariff sections, which are filed in clean and marked form (showing changes from the Certificate Application) in Exhibit P.
- Exhibit Q -- Effect of Acquisition on Existing Contracts and Tariffs. Omitted; not applicable.
- Exhibit R -- Acquisition Contracts. Withdrawn. Spire is withdrawing Exhibit R because Spire is no longer proposing to acquire any existing facilities.
- Exhibit S -- Accounting. Withdrawn. Spire is withdrawing Exhibit S because Spire is no longer proposing to acquire any existing facilities.
- Exhibit Z -- Form of Protective Agreement. Exhibit Z was filed with the Certificate Application and is not affected by this Amendment.

X. NOTICE

A form of notice suitable for publication in the *Federal Register* is attached.

XI. CONCLUSION

WHEREFORE, for the foregoing reasons, Spire respectfully requests that the Commission issue the authorizations requested in the Certificate Application, as amended by this Amendment, on or before December 1, 2017.

Respectfully submitted,

/s/ Michael C. Geiselhart

Michael C. Geiselhart
President
Spire STL Pipeline LLC

April 21, 2017

VERIFICATION

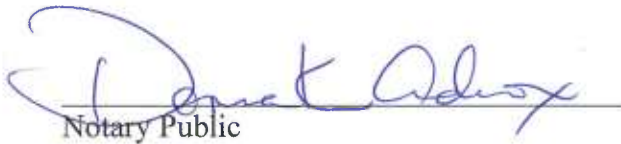
STATE OF MISSOURI)
) ss.
CITY OF ST. LOUIS)

Michael C. Geiselhart, being first duly sworn, states that he is the President of Spire STL Pipeline LLC; that he is authorized to execute this Verification; that he has read the foregoing document and is familiar with the contents thereof; and that all allegations of fact therein contained are true and correct to the best of his knowledge, information, and belief.

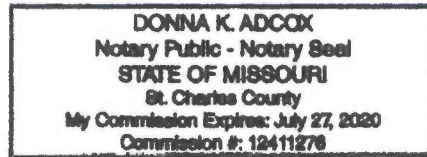


Michael C. Geiselhart
President

Subscribed and sworn to before me this 17th day of April, 2017.


Notary Public

My Commission Expires:



7/27/20

EXHIBIT F

Location of Facilities

A detailed description and location map of the facilities are submitted in Volume II under Resource Report 1 and in Figure 1.1-1 and Appendices 1-A and 1-B.

EXHIBIT F-I

Environmental Report

The public portions of Exhibit F-I are submitted in Volume II. The remainder of Exhibit F-I contains Privileged and Confidential information regarding agency correspondence, landowner notification information, species-specific reports and surveys, construction information pertaining to wildlife habitats, and cultural resource information that should be treated on a confidential basis and is included separately in Volume IV. This information has been removed for privileged treatment and is marked “**CUI//PRIV CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE.**”

EXHIBIT G

**Flow Diagrams Reflecting
Proposed Facilities**

SUMMARY

Exhibit G shows the daily design capacity of Spire STL Pipeline LLC's ("Spire") interstate natural gas pipeline system as amended in this Amendment and reflecting all of the facilities which Spire proposes as part of this Project. Because Exhibit G contains information about proposed critical infrastructure that could be useful to a person planning an attack on Spire's proposed interstate pipeline system, Exhibit G has been determined to contain Critical Energy Infrastructure Information.

Exhibit G is included separately in Volume III. This information has been removed for privileged treatment and is marked "**CUI//CEII CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE.**"

Spire requests that the CEII designation of Exhibit G commence as of the date of filing – April 21, 2017 – and last for the maximum five-year period. Because Spire's proposed interstate pipeline system is expected to remain in operation indefinitely after being placed into service, Spire requests that the Commission continue to re-designate this information as CEII indefinitely, or for the maximum duration permitted by law.

EXHIBIT G-II

Flow Diagram Data

Exhibit G-II contains the engineering data – including various assumptions, formulae, and methods used to prepare the flow diagram submitted in Exhibit G – to explain and support Spire STL Pipeline LLC’s (“Spire”) interstate natural gas pipeline system as amended in this Amendment. Because Exhibit G-II contains information about proposed critical infrastructure that could be useful to a person planning an attack on Spire’s proposed interstate pipeline system, Exhibit G-II has been determined to contain Critical Energy Infrastructure Information.

Exhibit G-II is included separately in Volume III. This information has been removed for privileged treatment and is marked “**CUI//CEII CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE.**”

Spire requests that the CEII designation of Exhibit G commence as of the date of filing – April 21, 2017 – and last for the maximum five-year period. Because Spire’s proposed interstate pipeline system is expected to remain in operation indefinitely after being placed into service, Spire requests that the Commission continue to re-designate this information as CEII indefinitely, or for the maximum duration permitted by law.

EXHIBIT I

Market Data

Spire's proposed market, as evidenced by the Precedent Agreement ("PA") in place with its Foundation Shipper, Laclede Gas Company, that was included in Volume IV of the Certificate Application, has not changed as a result of this Amendment. Spire and Laclede have executed an amendment to that PA whose sole purpose is to delete references in the PA to Line 880 in light of the adoption of the North County Extension as the preferred route. A copy of that PA amendment is included in Volume IV and marked "**CUI//PRIV CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE**" consistent with Spire's request for privileged and confidential treatment of the competitively sensitive information contained therein.

EXHIBIT J

Federal Authorizations

The attached table details the following information:

- (1) Federal authorizations required for the Project;
- (2) Issuing Agency for each authorization;
- (3) Date the request(s) for each authorization was submitted or, if the request has not yet been submitted, an explanation as to why the request has not been submitted and an expected submittal date; and
- (4) Date of expected authorizations or requested authorization dates.

Exhibit J- Federal Authorizations				
Agency or Organization	Permit/Approval	Submittal Date ¹ (Anticipated)	Receipt Date ¹ (Anticipated)	Comments ²
Federal				
FERC	Certificate of Public Convenience and Necessity	January 2017, April 2017	(December 2017)	Amendment filed April 2017
United States Fish and Wildlife Service ("USFWS"), Rock Island Field Office	Threatened and Endangered Species Consultation; Migratory Bird Treaty Act, Bald and Golden Eagle Act	June 2016 (consultation initiated)	(December 2017)	Ongoing
USFWS, Columbia Field Office	Threatened and Endangered Species Consultation; Migratory Bird Treaty Act, Bald and Golden Eagle Act	Rock Island will be the lead USFWS office	N/A	N/A
United States Army Corps of Engineers ("USACE"), St. Louis District	Section 404, Section 10 [Nationwide Permit ("NWP") 12]	January 2017, April 2017	(January 2018)	Amendment filed April 2017
	Section 408	January 2017	(January 2018)	Filed in January 2017
	Real Estate Agreement	January 2017	(May 2018)	Filed in January 2017
State-Illinois				
Illinois Environmental Protection Agency	401 Water Quality Certification	January 2017, (April 2017)	(January 2018)	Section 401 is issued under USACE NWP-12 provided that General and Regional Conditions are met.
	State Operating Permit for Wastewater Discharges	(June 2017)	(September 2017)	Request not submitted yet due to confirmation of water sources and discharge locations.
Illinois Environmental Protection Agency	General NPDES Permit No. ILR10	N/A	N/A	Oil and gas activities are exempt from submitting for NPDES Construction Stormwater Permit provided that FERC Plan and Procedures and State Best Management Practices are incorporated into construction activities.

Exhibit J- Federal Authorizations				
Agency or Organization	Permit/Approval	Submittal Date ¹ (Anticipated)	Receipt Date ¹ (Anticipated)	Comments ²
State-Missouri				
Missouri Department of Natural Resources ("MDNR"), St. Louis Regional Office	401 Individual Water Quality Certification	(April 2017)	(July 2017)	Individual 401 Water Quality Certification required based on reissuance of the conditions associated with 2017 USACE NWP-12
	Hydrostatic Discharge Permit	(October 2017)	(November 2017)	Request not submitted due to pending water sources and discharge locations.
	Land Disturbance Permit	N/A	N/A	Oil and gas activities are exempt from submitting for NPDES Construction Stormwater Permit provided that FERC Plan and Procedures and State Best Management Practices are incorporated into construction activities.

Notes:

N/A - Not Applicable.

- ¹ Submittal dates and anticipated permit receipt dates are based on schedules discussed with the regulatory agencies.
- ² All Project required permits will be obtained prior to construction.

EXHIBIT K

Cost of Facilities

Right of Way & Survey/Damages	Estimate based on previous experience and estimated land values.
Environmental	Contract environmental.
Engineering & Inspection	Contract engineering, inspection, construction support and project management.
Materials	Estimate based on current indicative vendor pricing.
Construction/Contractor Labor	Estimate based on current indicative construction contractor pricing.
Other Services & Costs	Company's cost of developing the project up until the in-service date, including project support, office space, office equipment, and other miscellaneous costs.
Overhead	Estimated Company cost for administrative support of the project.
Contingencies	Estimated allowance for unknown items or circumstances that may increase the expenses of the facilities.
AFUDC	AFUDC is calculated based on a 50/50 debt/equity capital structure with a 7 percent assumed cost of debt and 14 percent cost of equity. AFUDC accrual is calculated based on the date of filing of the pre-filing application. Consistent with Commission policy, AFUDC is calculated by taking one-half month's AFUDC on current month's construction expenditures and includes the month's beginning balance of construction expenditures in the allowance base.

**Spire STL Pipeline
Exhibit K - April 2017**

Estimated Capital Cost Of Facilities

<u>Line No.</u>	<u>Description</u>	<u>Pipeline</u> (a)	<u>M&R</u> (b)	<u>Total Cost</u> (c)
1	Right of Way & Damages	\$ 9,799,910	\$ 1,088,879	\$ 10,888,789
2	Environmental	\$ 4,527,165	\$ 503,018	\$ 5,030,183
3	Engineering & Inspection	\$ 14,786,327	\$ 1,642,925	\$ 16,429,252
4	Materials	\$ 23,708,400	\$ 14,850,158	\$ 38,558,559
5	Construction/Contractor Labor	\$ 102,010,832	\$ 4,966,500	\$ 106,977,332
6	Other Services & Costs	\$ 7,706,126	\$ 856,236	\$ 8,562,362
7	Overhead	\$ 3,253,109	\$ 361,457	\$ 3,614,566
8	AFUDC	\$ 11,779,858	\$ 1,308,873	\$ 13,088,731
9	Contingency	\$ 15,413,754	\$ 1,712,639	\$ 17,126,393
10				
11	Total Project Capital Costs	<u>\$ 192,985,481</u>	<u>\$ 27,290,686</u>	<u>\$ 220,276,167</u>

EXHIBIT L

Financing

Construction Financing

For the purpose of this filing and presentation in this Exhibit L, it is assumed that Spire STL Pipeline LLC (“Spire”) will fund the construction of the Project with 50 percent debt (either: (a) an intercompany loan from the parent or (b) a construction loan at the subsidiary level) and 50 percent equity. The terms and conditions applicable to the construction financing and financing after in-service, such as price, maturity and rate, will depend upon the financial market conditions existing at the time the debt is raised. For the purpose of presentation in this Exhibit L, it is assumed that the debt will have an overall cost of 7 percent. The interest rate of 7 percent is based on forward projections of US Treasury bond rates and credit spreads of similar risk investments that exist as of the date of this filing. However, it is the intent of Spire to seek the most favorable terms available in the marketplace at the time of financing. In consideration of several factors, including its proposed capital structure and current and anticipated capital market conditions, particularly as they affect cost of capital for interstate natural gas pipelines, Spire proposes a return on equity of 14 percent.

Supporting Schedules

Exhibit L, Page 1 of 3 – *Pro Forma* Statement of Cash Flow (attached)

Exhibit L, Page 2 of 3 – *Pro Forma* Statement of Income (attached)

Exhibit L, Page 3 of 3 – *Pro Forma* Balance Sheet (attached)

Pro Forma Statement of Cash Flow - April 2017

<u>Line</u> <u>No.</u>	<u>Description</u> (a)	<u>Year 1</u> (b)	<u>Year 2</u> (c)	<u>Year 3</u> (d)
1	Sources:			
2	Annual Depreciation Expense	\$ 4,405,523	\$ 4,405,523	\$ 4,405,523
3	Net Income	\$ 12,429,050	\$ 9,434,285	\$ 10,840,866
4	Annual Deferred Income Taxes	\$ 2,458,702	\$ 6,146,754	\$ 5,368,165
5	Total Sources	<u>\$ 19,293,276</u>	<u>\$ 19,986,563</u>	<u>\$ 20,614,554</u>
6	Uses:			
7	Debt Retirement	\$ 4,123,030	\$ 4,413,092	\$ 4,723,874
8	Change in Working Capital	\$ -	\$ -	\$ -
9	Available for Stockholder Use	\$ 15,170,246	\$ 15,573,471	\$ 15,890,680
10	Total Uses	<u>\$ 19,293,276</u>	<u>\$ 19,986,563</u>	<u>\$ 20,614,554</u>

Pro Forma Statement of Income - April 2017

<u>Line</u> <u>No.</u>	<u>Description</u> (a)	<u>Year 1</u> (b)	<u>Year 2</u> (c)	<u>Year 3</u> (d)
1	Operating Revenues	<u>\$ 43,721,417</u>	<u>\$ 43,721,417</u>	<u>\$ 43,721,417</u>
2	Operating Expenses			
3	O&M and A&G Expenses	\$ 5,727,180	\$ 5,870,360	\$ 6,017,119
4	Annual Depreciation Expense	4,405,523	4,405,523	4,405,523
5	Taxes Other Than Income	<u>1,740,374</u>	<u>1,740,374</u>	<u>1,740,374</u>
6	Total Operating Expenses	Lines 3 + 4 + 5 <u>11,873,078.13</u>	<u>12,016,258</u>	<u>12,163,017</u>
7	Operating Income	Line 1 - Line 6 31,848,339	31,705,160	31,558,401
8	Long-Term Debt Expenses	<u>7,488,692</u>	<u>7,119,362</u>	<u>6,777,283</u>
9	Income Before Income Taxes	Line 7 - Line 8 24,359,647	24,585,797	24,781,117
10	Income Taxes			
11	Current Taxes	9,471,895	9,004,757	8,572,087
12	Annual Deferred Income Taxes	<u>2,458,702</u>	<u>6,146,754</u>	<u>5,368,165</u>
13	Total Income Taxes	Line 11 + Line 12 <u>11,930,597</u>	<u>15,151,511</u>	<u>13,940,252</u>
14	Net Income	Line 9 - Line 13 <u>\$ 12,429,050</u>	<u>\$ 9,434,285</u>	<u>\$ 10,840,866</u>

Pro Forma Balance Sheet - April 2017

Line No.	<u>Description</u> (a)	<u>Year 1</u> (b)	<u>Year 2</u> (c)	<u>Year 3</u> (d)
1	Assets:			
2	Working Capital	\$ 550,690	\$ 550,690	\$ 550,690
3	Current Assets	550,690	550,690	550,690
4	Gross Plant	220,276,167	220,276,167	220,276,167
5	Less: Accumulated Depreciation	4,405,523	8,811,047	13,216,570
6	Net Plant	215,870,643	211,465,120	207,059,597
7	Total Assets	<u>216,421,334</u>	<u>212,015,811</u>	<u>207,610,287</u>
8	Liabilities & Equity:			
9	Accumulated Deferred Income Taxes	\$ 2,458,702	\$ 8,605,456	\$ 13,973,621
10	Long-term Debt	99,470,688	95,057,596	90,333,722
11	Equity	114,491,944	108,352,760	103,302,944
12	Total Liabilities & Equity	<u>\$ 216,421,334</u>	<u>\$ 212,015,811</u>	<u>\$ 207,610,287</u>

EXHIBIT N

Revenues, Expenses and Income

Explanatory Statement

This Exhibit N contains pages 1 through 9, which show the derivation of the revenues, cost of service and rates for the Spire STL Pipeline LLC (“Spire”) facilities. Where applicable, costs and revenues are projected over a three-year period. The rates are designed using the straight fixed-variable rate design and the rate design reflects an interruptible transportation revenue credit of \$200,000 to the system cost of service.

The details of the derivation of the revenues, cost of service and rates are set out as follows:

- Page 1: Presents the derivation of incremental rates based on the costs of the new facilities proposed in this application. Consistent with Commission policy, Spire has included an interruptible transportation revenue credit to the system cost of service.

- Page 2: Presents comparison of anticipated operating revenues versus cost of service for a three-year period.

- Page 3: Summary of anticipated operating revenues for first three years of operation.

- Page 4: Presents the calculation of projected rate base and return for the first three years of operations.

- Page 5: Presents projected operation and maintenance expenses and administrative and general expenses.

- Page 6: Presents the calculation of annual depreciation expense at a depreciation rate of 2 percent and accumulated depreciation for the first three years of operations.
- Page 7: Presents the calculation of Federal income taxes and state income taxes. The taxes are based on a composite income tax rate of 38.74 percent.
- Page 8: Presents the calculation of taxes other than income taxes for the first three years of operation. The other taxes reflected on this exhibit are Ad Valorem taxes.
- Page 9: Reflects the anticipated capital structure, rate of return, and debt costs. Spire has utilized a hypothetical capital structure of 50 percent equity and 50 percent debt and a return on equity of 14 percent. The assumed cost of debt is 7 percent.

Derivation of Rates - April 2017

Line	<u>Description</u>	<u>Reservation</u>	<u>Usage</u>	<u>Total</u>
	(a)	(b)	(c)	(d)
1	Rate Design:			
2	Rate Schedule FTS 1/	400,000	144,000,000	
3	Rate Schedule ITS	-	-	
4	Total Daily Determinants	400,000		
5	Rate Design Determinants (Line 4 * 12)	<u>4,800,000</u>	<u>144,000,000</u>	
6	Cost of Service:			
7	Rate Schedule FTS	\$ 43,921,417		
8	Interruptible Transportation Revenue Credit 2/	<u>200,000</u>		
9		<u>\$ 43,721,417</u>	\$ -	<u>\$ 43,721,417</u>
10	FTS Rates	\$ 9.1086	\$ -	
11	ITS Rate 3/	\$ 0.2995		
12	Overrun Rate 3/	\$ 0.2995		
13	PAL Rate 3/	\$ 0.2995		
14	Retainage Percentage	0.25%		

1/ Billing determinants are based on system capacity of 400,000 Dth/day

2/ An interruptible transportation revenue credit of \$200,000 has been applied to the total system cost of service.

3/ ITS, PAL and overrun rate based on 100% Load Factor Equivalent of FTS Rates.

Cost of Service and Revenue - April 2017

<u>Line No.</u>	<u>Description</u> (a)	<u>Exhibit Reference</u> (b)	<u>Year 1</u> (c)	<u>Year 2</u> (d)	<u>Year 3</u> (e)
1	Operating Revenues	Exh. N, P. 3	<u>\$ 43,721,417</u>	<u>\$ 43,721,417</u>	<u>\$ 43,721,417</u>
	Operating Expenses				
2	O&M and A&G Expenses	Exh. N, P. 5	\$ 5,727,180	\$ 5,870,360	\$ 6,017,119
3	Annual Depreciation Expense	Exh. N, P. 6	4,405,523	4,405,523	4,405,523
4	Taxes Other Than Income	Exh. N, P. 8	1,740,374	1,740,374	1,740,374
5	Return	Exh. N, P. 4	22,466,076	21,358,087	20,331,850
6	Federal and State Income Tax	Exh. N, P. 7	9,471,895	9,004,757	8,572,087
7	Tax Gross-up of Amortization of Equity AFUDC		<u>110,366</u>	<u>110,366</u>	<u>110,366</u>
8	Total Cost of Service		\$ 43,921,417	\$ 42,489,470	\$ 41,177,321
9	ITS Revenue Credit		<u>\$ 200,000</u>	<u>\$ 200,000</u>	<u>\$ 200,000</u>
10	Total Cost of Service less Revenue Credit		<u>\$ 43,721,417</u>	<u>\$ 42,289,470</u>	<u>\$ 40,977,321</u>
11	Revenue in Excess of Cost of Service		<u>\$ -</u>	<u>\$ 1,431,948</u>	<u>\$ 2,744,097</u>

Summary of Anticipated Operating Revenues - April 2017

Line <u>No.</u>	<u>Description</u> (a)	Year 1 <u>Amount</u> (b)	Year 2 <u>Amount</u> (c)	Year 3 <u>Amount</u> (d)
1	Estimated Revenues	<u>\$ 43,721,417</u>	<u>\$ 43,721,417</u>	<u>\$ 43,721,417</u>
2	Total Revenues	\$ 43,721,417	\$ 43,721,417	\$ 43,721,417

Rate Base and Return Summary - April 2017

<u>Line No.</u>	<u>Description</u> (a)	<u>Exhibit Reference</u> (b)	<u>Year 1</u> (c)	<u>Year 2</u> (d)	<u>Year 3</u> (e)
1	Gross Plant	Exhibit K	\$ 220,276,167	\$ 220,276,167	\$ 220,276,167
2	Accumulated Provision for Depreciation	Exhibit N, Page 6	<u>4,405,523</u>	<u>8,811,047</u>	<u>13,216,570</u>
3	Net Gas Plant	(Line 1)-(Line 2)	215,870,643	211,465,120	207,059,597
4	Accumulated Deferred Income Taxes		(2,458,702)	(8,605,456)	(13,973,621)
5	Working Capital		550,690	550,690	550,690
6	Total Rate Base	Line 3)+(Line 4)+(Line5)	213,962,632	203,410,355	193,636,666
7	Rate of Return	Exhibit N, Page 9	10.50%	10.50%	10.50%
8	Return	(Line 6)*(Line 7)	<u>\$ 22,466,076</u>	<u>\$ 21,358,087</u>	<u>\$ 20,331,850</u>

Operation and Maintenance Expenses - April 2017

Line <u>No.</u>	FERC <u>Acct. No</u> (a)	<u>Account</u> (b)	<u>Year 1</u> <u>Amount</u> (c)	<u>Year 2</u> <u>Amount</u> (d)	<u>Year 3</u> <u>Amount</u> (e)
1	TRANSMISSION OPERATION AND MAINTENANCE EXPENSES				
2	Operation				
3	850	Operation Supervision and Engineering	\$ -	\$ -	\$ -
4	851	System Control and Load Dispatching	-		
5	852	Communication System Expenses	-	-	-
6	856	Mains Expenses	-	-	-
7	857	Measuring and Regulating Station Expenses	-	-	-
8	859	Other Expenses	-	-	-
9	860	Rents	-	-	-
10	TOTAL Operation		\$ -	\$ -	\$ -
11	Maintenance				
12	861	Maintenance Supervision and Engineering	-	-	-
13	862	Maintenance of Structures and Improvements	-	-	-
14	863	Maintenance of Mains	-	-	-
15	865	Maintenance of Measuring and Regulating Station Equipm	-	-	-
16	866	Maintenance of Communication Equipment	-	-	-
17	867	Maintenance of Other Equipment	-	-	-
18	TOTAL Maintenance		\$ -	\$ -	\$ -
19	TOTAL Operation and Maintenance Expenses		\$ 2,533,176	\$ 2,596,505	\$ 2,661,418
			Estimated at 1.15% of Gross Plant		
20	ADMINISTRATIVE AND GENERAL EXPENSES				
21	Operation				
22	920	Administrative and General Salaries	\$ -	-	-
23	921	Office Supplies and Expenses	-	-	-
24	923	Outside Services Employed	-	-	-
25	924	Property Insurance	-	-	-
26	925	Injuries and Damages	-	-	-
27	926	Employee Pensions and Benefits	-	-	-
28	928	Regulatory Commission Expenses	-	-	-
29	930	Miscellaneous General Expenses	-	-	-
30	931	Rents	-	-	-
31	TOTAL Operation		\$ -	\$ -	\$ -
32	Maintenance				
33	932	Maintenance of General Plant	-	-	-
34	TOTAL Administrative and General Expenses		\$ 3,194,004	\$ 3,273,855	\$ 3,355,701
			Estimated at 1.45% of Gross Plant		
35	TOTAL O&M and A&G Expenses		\$ 5,727,180	\$ 5,870,360	\$ 6,017,119

**Calculation of Depreciation Expense and
Accumulated Depreciation Expense - April 2017**

Line No.	<u>Description</u> (a)	Year 1 <u>Amount</u> (b)	Year 2 <u>Amount</u> (c)	Year 3 <u>Amount</u> (d)
<u>Depreciation</u>				
1	Gross Plant	\$ 220,276,167	\$ 220,276,167	\$ 220,276,167
2	Depreciation Rate	2.00%	2.00%	2.00%
3	Annual Depreciation Expense	<u>\$ 4,405,523</u>	<u>\$ 4,405,523</u>	<u>\$ 4,405,523</u>
4	Accumulated Depreciation Expense	<u>\$ 4,405,523</u>	<u>\$ 8,811,047</u>	<u>\$ 13,216,570</u>

Federal and State Income Taxes - April 2017

Line No.	<u>Description</u> (a)	<u>Year 1</u> (b)	<u>Year 2</u> (c)	<u>Year 3</u> (d)
1	Return Allowance	\$ 22,466,076	\$ 21,358,087	\$ 20,331,850
2	Less: Interest Cost	<u>7,488,692</u>	<u>7,119,362</u>	<u>6,777,283</u>
3	Taxable Return	<u>\$ 14,977,384</u>	<u>\$ 14,238,725</u>	<u>\$ 13,554,567</u>
4	Federal and State Income Tax	<u>\$ 9,471,895</u>	<u>\$ 9,004,757</u>	<u>\$ 8,572,087</u>

Composite Tax rate	38.74%
Federal Rate	35.00%
State Rate	7.04%
Composite Adjustment	-3.30%

Taxes Other Than Income - April 2017

<u>Line</u> <u>No.</u>	<u>Description</u> (a)	<u>Year 1</u> (b)	<u>Year 2</u> (c)	<u>Year 3</u> (d)
1	Property (Ad Valorem) Taxes	\$ 1,740,374	\$ 1,740,374	\$ 1,740,374
2	Payroll Taxes	\$ -	\$ -	\$ -
3	Franchise Taxes	\$ -	\$ -	\$ -
4	Total Taxes Other Than Income	<u>\$ 1,740,374</u>	<u>\$ 1,740,374</u>	<u>\$ 1,740,374</u>

Capital Structure and Rate of Return - April 2017

<u>Line</u> <u>No.</u>	<u>Description</u> (a)	<u>Percent of</u> <u>Total Capital</u> (b)	<u>Cost of</u> <u>Capital</u> (c)	<u>Weighted</u> <u>Cost of Capital</u> (d)
1	Long-Term Debt	50.00%	7.00%	3.50%
2	Common Equity	<u>50.00%</u>	14.00%	<u>7.00%</u>
3	Total	100.00%		10.50%

EXHIBIT P

Tariff

Explanatory Statement

Included in Exhibit P hereto are minor tariff revisions, in both clean and marked form, to Spire STL Pipeline LLC's ("Spire") *Pro Forma* FERC NGA Gas Tariff, Original Volume No. 1, to reflect an updated description of Spire's pipeline system based on the North County Extension (Section 2) and a slight change to the Rate Schedule FTS monthly reservation rate on the Statement of Currently Effective Rates for Services (Section 4).

EXHIBIT P

Clean Tariff Sections 2 and 4

PRELIMINARY STATEMENT

Spire STL Pipeline LLC (“Spire”) transports natural Gas in interstate commerce by means of a natural Gas pipeline system which it owns and operates pursuant to authority granted by the Federal Energy Regulatory Commission (“FERC”).

Spire’s pipeline system consists of approximately 65 miles of 24-inch diameter high pressure pipeline originating at a point of interconnection with Rockies Express Pipeline LLC (“REX”) in Scott County, Illinois and extending to a bi-directional point of interconnection in St. Louis County, Missouri with Enable Mississippi River Transmission, LLC. Spire also has two delivery interconnects with Laclede Gas Company in St. Louis County, Missouri.

Spire is committed to providing high quality, reliable service to its Customers at reasonable rates. Spire will provide all FERC-jurisdictional service pursuant to the applicable terms and conditions of this FERC NGA Gas Tariff in a manner that is consistent with the Natural Gas Act.

STATEMENT OF CURRENTLY EFFECTIVE RATES
 FOR SERVICES
 Rates per Dth

	<u>Maximum Rate</u>	<u>Minimum Rate</u>	<u>Fuel Use 2/</u>	<u>Lost Gas</u>
<u>RATE SCHEDULE FTS 1/</u>				
Charges:				
Reservation	\$9.1086	\$0.0000		
Usage	\$0.0000	\$0.0000	0.00%	0.25%
Authorized Overrun Service	\$0.2995	\$0.0000	0.00%	0.25%

RATE SCHEDULE ITS 1/

Charges:

Usage	\$0.2995	\$0.0000	0.00%	0.25%
Authorized Overrun Service	\$0.2995	\$0.0000	0.00%	0.25%

RATE SCHEDULE PALS 3/

Charges:

Daily Balance Rate	\$0.2995	\$0.0000		
Activity Rate	\$0.2995	\$0.0000		

- 1/ Customer shall also (1) provide Fuel Use and Lost Gas reimbursement based on the percentages set forth above; and (2) pay the applicable Annual Charge Adjustment (“ACA”) Surcharge established by FERC.
- 2/ Spire reserves the right to not assess the Fuel Use percentage when no fuel is used.
- 3/ Rate Schedule PALS service will not be assessed Fuel Use and Lost Gas percentages or the ACA Surcharge.

EXHIBIT P

Marked Tariff Sections 2 and 4

PRELIMINARY STATEMENT

Spire STL Pipeline LLC (“Spire”) transports natural Gas in interstate commerce by means of a natural Gas pipeline system which it owns and operates pursuant to authority granted by the Federal Energy Regulatory Commission (“FERC”).

Spire’s pipeline system consists of approximately 656 miles of ~~20-inch and~~ 24-inch diameter high pressure pipeline originating at a point of interconnection with Rockies Express Pipeline LLC (“REX”) in Scott County, Illinois and extending to a bi-directional point of interconnection in St. Louis County, Missouri with Enable Mississippi River Transmission, LLC. Spire also has two delivery interconnects with Laclede Gas Company in St. Louis County, Missouri.

Spire is committed to providing high quality, reliable service to its Customers at reasonable rates. Spire will provide all FERC-jurisdictional service pursuant to the applicable terms and conditions of this FERC NGA Gas Tariff in a manner that is consistent with the Natural Gas Act.

STATEMENT OF CURRENTLY EFFECTIVE RATES
 FOR SERVICES
 Rates per Dth

	<u>Maximum Rate</u>	<u>Minimum Rate</u>	<u>Fuel Use 2/</u>	<u>Lost Gas</u>
<u>RATE SCHEDULE FTS 1/</u>				
Charges:				
Reservation	\$ 9.1092 <u>9.1086</u>	\$0.0000		
Usage	\$0.0000	\$0.0000	0.00%	0.25%
Authorized Overrun Service	\$0.2995	\$0.0000	0.00%	0.25%

<u>RATE SCHEDULE ITS 1/</u>				
Charges:				
Usage	\$0.2995	\$0.0000	0.00%	0.25%
Authorized Overrun Service	\$0.2995	\$0.0000	0.00%	0.25%

<u>RATE SCHEDULE PALS 3/</u>				
Charges:				
Daily Balance Rate	\$0.2995	\$0.0000		
Activity Rate	\$0.2995	\$0.0000		

- 1/ Customer shall also (1) provide Fuel Use and Lost Gas reimbursement based on the percentages set forth above; and (2) pay the applicable Annual Charge Adjustment (“ACA”) Surcharge established by FERC.
- 2/ Spire reserves the right to not assess the Fuel Use percentage when no fuel is used.
- 3/ Rate Schedule PALS service will not be assessed Fuel Use and Lost Gas percentages or the ACA Surcharge

CERTIFICATE OF SERVICE

On this, the 21st day of April, 2017, a true and correct copy of the foregoing document was served by electronic transmission upon all parties listed on the service list prepared by the Office of the Secretary for the above-captioned proceeding.

Russell E. Kooistra
Russell E. Kooistra
Troutman Sanders LLP
401 9th Street NW, Suite 1000
Washington, D.C. 20004