

Spire STL Pipeline LLC 700 Market Street St. Louis, Missouri 63101

April 21, 2017

BY ELECTRONIC TRANSMISSION

The Honorable Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: *Spire STL Pipeline LLC*, Docket No. CP17-40-____ Amendment to Application of Spire STL Pipeline LLC for Certificates of Public Convenience and Necessity

CRITICAL ENERGY INFRASTRUCTURE INFORMATION AND PRIVILEGED AND CONFIDENTIAL INFORMATION CONTAINED IN VOLUMES III AND IV

Dear Secretary Bose:

Pursuant to Section 7(c) of the Natural Gas Act, 15 U.S.C. § 717f(c) (2012), and Part 157 of the regulations of the Federal Energy Regulatory Commission ("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").

As explained in the enclosed Amendment and its accompanying attachments, Spire is proposing a route alternative for the last segment of its proposed pipeline that it has determined to be preferred over its originally proposed route for its new interstate natural gas pipeline, the Spire STL Pipeline Project ("Project"). The proposed route alternative is a six-mile greenfield pipeline segment, referred to as the North County Extension, which lies in close proximity to Spire's original route. The North County Extension had been identified in Spire's Certificate Application as Minor Alternative 5.

In accordance with Part 157 of the Commission's regulations, Spire is submitting, in electronic form, the following materials:

Volume IThe Amendment and public exhibits other than the Environmental Resource(Public)Reports that have been updated in this Amendment (public portions of
Exhibits G, G-II, and I, as well as Exhibits J, K, L, N, P).1

¹ Exhibits A, B, C, D, M, O, P-2, and Z, which were filed with the Certificate Application, are not affected by this Amendment. Exhibits R and S, which were also filed with the Certificate Application, are being withdrawn because Spire is no longer proposing to acquire any existing facilities.

Exhibit F and the public version of Exhibit F-I (Environmental Resource Reports).

Volume III
(Critical Energy
Infrastructure
Information)
Exhibits G and G-II, which include specific technical information pertaining to Spire's pipeline facilities and nearby energy infrastructure, the disclosure of which could be useful to a person planning an attack on this infrastructure. Accordingly, and pursuant to the Commission's regulations and filing instructions, Iroquois requests treatment of this Volume as Critical Energy Infrastructure Information, and it is marked "CUI//CEII CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE."

Volume IV (Privileged) Appendices 1-C, 1-G, 4-A, 4-B, 4-D, and 6-B of Exhibit F-I, which material comprises privileged agency correspondence, landowner notification information, geotechnical information, and cultural resource information that should be treated on a confidential basis and not subject to public disclosure. *See* 18 C.F.R. § 380.12(f)(4) (2017). Volume IV also includes Exhibit I, which contains the Amendment to Precedent Agreement between Spire and its Foundation Shipper. The Precedent Agreement, as amended, contains confidential, proprietary, and commercially sensitive information, the disclosure of which could unnecessarily harm the parties. Accordingly, and pursuant to the Commission's regulations and filing instructions, Spire requests treatment of this Volume as Privileged, and it is marked "CUI//PRIV CONTAINS PRIVILEGED INFORMATION – DO NOT RELEASE."

Questions pertaining to privileged information should be submitted to:

Castor Armesto General Counsel Spire STL Pipeline LLC 700 Market Street St. Louis, Missouri 63101 Phone: 314-342-0500 Email: castor.armesto@spireenergy.com

Volume II

(**Public**)

Pursuant to the Commission's electronic filing guide, Spire is eFiling this Application and will provide one complete copy to OEP Room 62-46 and one complete copy to OGCEP Room 101-56.

Please contact the undersigned if there is any additional information you require or if you have any questions about this submission.

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Respectfully submitted,

/s/ Michael C. Geiselhart

Michael C. Geiselhart President Spire STL Pipeline LLC

Enclosures

cc (w/o enclosures):

Mr. Terry Turpin, Deputy Director, Office of Energy Projects Mr. John Wood, Office of Energy Projects Mr. Rich McGuire, Office of Energy Projects

cc (w/ Vol. I of enclosures):

Ms. Monique Watson, Office of Energy Markets and Regulation

cc (w/ enclosures):

Mr. Howard Wheeler, Office of Energy Projects Mr. Kevin Bowman, Office of Energy Projects Ms. S. Xiah Kragie, Office of Energy Projects

cc (w/ Vol. I and Vol. II of enclosures): All parties listed on the service list