UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Spire STL Pipeline LLC	)	Docket No. CP17-40-007

REPLY COMMENTS OF
ENABLE MISSISSIPPI RIVER TRANSMISSION, LLC

Pursuant to the August 6, 2021 Notice issued in the captioned docket,[1] Enable Mississippi River Transmission, LLC ("MRT") which has previously intervened in this proceeding,[2] submits the following brief reply comments to address circumstances related to its East Line. Attachment A contains copies of communications between MRT and Spire representatives concerning service available on the East Line.

On June 23, 2021, MRT wrote Spire's representative that MRT's East Line could accommodate "as much as 181,402 Dth" per day for the upcoming winter, explaining several days later that "MRT has expanded its capability of transporting volumes off the East Line through [MRT's] . . . reticulated system as part of the Southbound expansion . . . . Please let me know if you are interested in subscribing for this East Line capacity." *See* Attachment A, June 28, 2021 4:42 pm email. Two days later MRT confirmed that the entire amount of available East Line capacity could be delivered to a point of interconnection with Spire Missouri about which the latter had inquired.[3]

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1 Spire STL Pipeline LLC, Docket No. CP17-40-007, "Notice of Application and Establishing Intervention Deadline" (Aug. 6, 2021), p. 2.

2 *See* "Motion to Intervene of Enable Mississippi River Transmission, LLC," Spire STL Pipeline LLC, Docket No. CP17-40 (Feb. 2, 2017); "Order Issuing Certificate," *Spire STL Pipeline LLC*, 164 FERC ¶ 61,085 at P 15 (2018).

3 *Id*., June 30, 2021, 1:02 pm email ("Based on current system parameters and assumptions . . . MRT could deliver 181,407 Dth[*sic*][per day] to the [relevant] delivery point . . . .").

As required by Commission regulations, MRT posted notices of available capacity throughout the summer of 2021, updating available capacity levels, to reflect dynamics of changing market conditions. On August 19, 2021, MRT had posted 174,849 Dth/d of available East Line service, effective December 1, 2021.[4] In its posting dated September 16, 2021, that identified firm service available starting no earlier than October, 2021, MRT listed 140,849 Dth a day of East Line firm service to Market Zone delivery points effective December 1, 2021. *See* Attachment B hereto. That level of available service reflected the belief that 34,000 Dth/d of new FT contracts, tendered to an interested party for their execution, would be signed; but on October 4, 2021, MRT learned that contracts for 25,000 Dth of anticipated FT demand would in fact not be executed for service beginning December 1, 2021. MRT's next posting will reflect available capacity, effective December 1, 2021,based on circumstances as of the date of posting. Thus, while portions of previously-unsubscribed firm service had been successfully re-subscribed on a portion of East Line, as of the date of the instant filing, MRT still has 165,849 Dth/d of service available on the East Line.

[4] MRT posted both summer and winter capacities (the latter reflecting a higher value because maintenance scheduled during warmer weather would be completed by December 1, 2021, and because lower ambient temperatures allow for the transmission of greater volumes within a given pipeline). Information previously provided in September 6, 2021 data responses in this docket referenced the lower summer values, not the higher winter available capacity levels.

Respectfully submitted,

/s/ Mark F. Sundback

Jonathan Christian
Associate General Counsel
Enable Midstream Partners, LP
910 Louisiana, Ste. 48040, (48th Floor)
Houston, TX 77002
Telephone: (346) 701-2146
Fax: (346) 701-2905
Email:
jonathan.christian@enablemidstream.com

Mark F. Sundback
William M. Rappolt
Andrew P. Mina
Sheppard, Mullin, Richter & Hampton LLP
2099 Pennsylvania Avenue, NW, Suite 100
Washington, D.C. 20006-6801
Telephone: 202.747.1900
Facsimile: 202.747.1901
Email: msundback@sheppardmullin.com
Email: wrappolt@sheppardmullin.com
Email: amina@sheppardmullin.com

ATTORNEYS FOR ENABLE MISSISSIPPI RIVER TRANSMISSION, LLC

Lisa D. Yoho
Senior Director, Regulatory & FERC Compliance
Enable Midstream Partners, LP
910 Louisiana, Ste. 48040, (48th Floor)
Houston, TX 77002
Telephone: (346) 701-2539
Email: lisa.yoho@enablemidstream.com

Date: October 5, 2021

Attachment A

From: Stoll, Mike C
Sent: Wednesday, June 30, 2021 1:02 PM
To: Powers, Justin <Justin.Powers@spireenergy.com>
Subject: RE: MRT ML Capacity Available

Good afternoon Justin

Based on current system parameters and assumptions regarding the requested service, our analysis indicates that MRT could deliver all 181,407 Dth to the Arlee/Ivory delivery point on peak day.

Please let me know if you are interested in all or just a portion of this capacity.

Thank you!

Michael Stoll
Sr. Director-Commercial T&S

ENABLE
MIDSTREAM PARTNERS

14805 North Outer 40 Road
Suite 230
St. Louis, MO 63017
office (636) 812-7121 **(NEW)**
cell (314) 602-9509
mike.stoll@enablemidstream.com

From: Powers, Justin <Justin.Powers@spireenergy.com>
Sent: Monday, June 28, 2021 6:01 PM
To: Stoll, Mike C <mike.stoll@enablemidstream.com>
Subject: Re: MRT ML Capacity Available

EXTERNAL EMAIL

How much of the EL can physically get to Ivory?

From: Stoll, Mike C <mike.stoll@enablemidstream.com>
Sent: Monday, June 28, 2021 4:42:52 PM
To: Powers, Justin <Justin.Powers@spireenergy.com>
Subject: RE: MRT ML Capacity Available

Good afternoon Justin,

MRT has expanded its capability of transporting volumes off the East Line through the reticulated system as part of the Southbound expansion that allowed MRT to sell the 80,000 Dth of FT from Spire STL Pipeline to the Spire Mo. aggregate point, allowing MRT to more effectively transport gas from the East Line into the reticulated system.

Please let me know if you are interested in subscribing for this East Line capacity.

If you have any further questions, please don't hesitate to call or email me.

Michael Stoll
Sr. Director-Commercial T&S

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Suite 230
St. Louis, MO 63017
office (636) 812-7121 **(NEW)**
cell (314) 602-9509
mike.stoll@enablemidstream.com

From: Powers, Justin <Justin.Powers@spireenergy.com>
Sent: Friday, June 25, 2021 3:57 PM
To: Stoll, Mike C <mike.stoll@enablemidstream.com>
Subject: RE: MRT ML Capacity Available

EXTERNAL EMAIL

Mike,

How much could you physically deliver to points south of Chain of Rocks? I didn't think you had the ability to do much.

Thanks,

Justin

From: Stoll, Mike C <mike.stoll@enablemidstream.com>
Sent: Wednesday, June 23, 2021 4:33 PM
To: Powers, Justin <Justin.Powers@spireenergy.com>
Cc: Tramonte, Steven G <steven.tramonte@enablemidstream.com>; Christian, Jon F

<JONATHAN.CHRISTIAN@ENABLEMIDSTREAM.COM>; Yoho, Lisa D <Lisa.yoho@enablemidstream.com>; Smith, Kerry K <kerry.smith@enablemidstream.com>
Subject: RE: MRT ML Capacity Available

Good afternoon Justin,

MRT has 568 Dth/d of Main Line capacity of which 321 Dth/d could be sourced on the West line. In addition, MRT could have as much as 181,402 Dth available on the East Line for this winter and this amount assumes a lower delivery pressure from both Trunkline and NGPL which is more in line with what MRT has experienced from both pipes over the last few winters.

Please email or call me if you have further questions regarding this capacity.

Michael Stoll
Sr. Director-Commercial T&S

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14805 North Outer 40 Road
Suite 230
St. Louis, MO 63017
office (636) 812-7121 **(NEW)**
cell (314) 602-9509
mike.stoll@enablemidstream.com

From: Powers, Justin <Justin.Powers@spireenergy.com>
Sent: Wednesday, June 23, 2021 2:10 PM
To: Stoll, Mike C <mike.stoll@enablemidstream.com>
Subject: MRT ML Capacity Available

EXTERNAL EMAIL

Mike,

I am curious how much MRT ML space is available for this upcoming winter?

Thanks,

Justin Powers
Director, Gas Supply

700 Market Street 3rd Floor
St. Louis, MO 63101
314.452.4167 Mobile
314.658.8466 Fax
Jpowers2 ICE

Laclede Gas Company is now Spire.
Visit SpireEnergy.com to learn more.

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Attachment B

NOTICE OF AVAILABLE ENABLE-MRT CAPACITY

August 19, 2021

Enable Mississippi River Transmission, LLC ("MRT") is providing notice of the availability of firm capacity. See the table and effective dates below.

Customers and potential Customers interested in obtaining available firm capacity should contact Mike Stoll at (636) 812-7121 Mike.Stoll@EnableMidstream.com or Kathy Kennedy at (346) 701-2154 or John Pawlik (346) 701-2137

MRT will update this posting upon the award of any firm capacity and will continue to accept and review valid requests for any capacity that remains available, or becomes available in the future.

Incremental capacity may also be available between specific receipt and delivery points and/or along specific shorter haul paths. Contact Mike Stoll if you would like to discuss a specific path.

Summary of Available MRT Firm Transportation (Dth/d)

Location & Path	Available 01-Sep-21
Market Zone; East Line Receipt Points to Certain Market Zone Delivery Points	145,170*
Market Zone; MoGas Receipts to Certain Market Zone Delivery Points	50,000
Market Zone; NGPL Madison Receipts (April though October only) to Certain Market Zone Delivery Points	25,000
Market Zone to Market Zone; Northbound Main Line Capacity	19
Field Zone to Market Zone; Northbound Main Line Capacity to Main Line Field Zone or Market Zone Delivery Points	568
Field Zone Only - Annual Southbound; EGT Glendale Receipt Point, Southbound to Main Line Delivery Points	0
Field Zone Only - Seasonal Southbound; EGT Glendale Receipt Point to Main Line Delivery Points south of EGT Glendale. Available each May 16 through November 15 only.	2
Field Zone Only; Perryville Displacement to Main Line Field Zone Points	394,977
West Line Forward Haul	321
West Line Backhaul Only; Sligo and/or Dixie to AM-200	50,000

* 174,849 dth/d effective December 1, 2021

Summary of Available Firm Storage

	Available 01-Sep-21
Annual Capacity - MSQ (Dth)	4,369,182
Maximum Daily Withdrawal - MDWQ (Dth/d)	76,108

NOTICE OF AVAILABLE ENABLE-MRT CAPACITY

September 16, 2021

Enable Mississippi River Transmission, LLC ("MRT") is providing notice of the availability of firm capacity. See the table and effective dates below.

Customers and potential Customers interested in obtaining available firm capacity should contact Mike Stoll at (636) 812-7121 Mike.Stoll@EnableMidstream.com or Kathy Kennedy at (346) 701-2154 or John Pawlik (346) 701-2137

MRT will update this posting upon the award of any firm capacity and will continue to accept and review valid requests for any capacity that remains available, or becomes available in the future.

Incremental capacity may also be available between specific receipt and delivery points and/or along specific shorter haul paths. Contact Mike Stoll if you would like to discuss a specific path.

Summary of Available MRT Firm Transportation (Dth/d)

Location & Path	Available 01-Oct-21
Market Zone; East Line Receipt Points to Certain Market Zone Delivery Points	136,170*
Market Zone; MoGas Receipts to Certain Market Zone Delivery Points	50,000
Market Zone; NGPL Madison Receipts (April though October only) to Certain Market Zone Delivery Points	25,000
Market Zone to Market Zone; Northbound Main Line Capacity	19
Field Zone to Market Zone; Northbound Main Line Capacity to Main Line Field Zone or Market Zone Delivery Points	568
Field Zone Only - Annual Southbound; EGT Glendale Receipt Point, Southbound to Main Line Delivery Points	0
Field Zone Only - Seasonal Southbound; EGT Glendale Receipt Point to Main Line Delivery Points south of EGT Glendale. Available each May 16 through November 15 only.	2
Field Zone Only; Perryville Displacement to Main Line Field Zone Points	394,977
West Line Forward Haul	321
West Line Backhaul Only; Sligo and/or Dixie to AM-200	50,000

* 140,849 dth/d effective December 1, 2021

Summary of Available Firm Storage

	Available 01-Oct-21
Annual Capacity - MSQ (Dth)	4,369,182
Maximum Daily Withdrawal - MDWQ (Dth/d)	76,108

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of October, 2021, via electronic or U.S. mail, caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Mark F. Sundback