

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Spire Missouri, Inc.)
d/b/a Spire (East) Purchased Gas) File No. GR-2021-0127
Adjustment (PGA) Tariff Filing)

In the Matter of Spire Missouri, Inc.)
d/b/a Spire (West) Purchased Gas) File No. GR-2021-0128
Adjustment (PGA) Tariff Filing)

**APPLICATION TO INTERVENE
OF
ENVIRONMENTAL DEFENSE FUND**

COMES NOW the Environmental Defense Fund ("EDF"), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's ("Commission") Rules of Practice and Procedure, and respectfully applies for intervention as a party in this proceeding, initiated by Spire Missouri Inc ("Spire Missouri" or "the Company") on October 30, 2020. In support of its Application, EDF states as follows:

1. EDF is a nonprofit membership organization whose mission is to preserve the natural systems on which all life depends. Guided by science and economics, EDF finds practical and lasting solutions to the most serious environmental problems. EDF has a strong interest in minimizing the natural gas industry's significant contribution to climate change and other environmental problems. EDF uses the power of markets to speed the transition to clean energy resources, and consistent with its organizational purpose is engaged in activities to facilitate cost-effective and efficient energy market designs that encourage investment to modernize the energy grid so that it can support the ongoing deployment of renewable energy resources and energy efficiency.

2. EDF has over 5,600 members in Missouri.

3. EDF's members will be materially affected by the outcome of this docket.

4. EDF is a nonprofit corporation organized under the laws of New York with a Washington DC office at 1875 Connecticut Avenue NW Washington, DC 20011; contact Natalie Karas at that office at 202-572-3389 or nkaras@edf.org. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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5. On October 30, 2020, Laclede filed its Purchased Gas Adjustment or Actual Cost Adjustment ("PGA/ACA") for 2019-2020. The matters to be considered in this case and the Commission's determinations thereon could have a direct and significant impact on the cost of service to retail customers, including EDF's members. In particular, EDF's interest in this case pertains to the prudence and reasonableness of the costs of firm transportation capacity from a corporate affiliate of Spire Missouri. EDF raised these issues in GR-2017-0215; in that case, the Commission held that the instant proceeding is the proper forum to review the prudence of that decision.¹

6. Therefore, granting this proposed intervention would serve the public interest and would assist the Commission in development of a more complete record. EDF's interest is direct, immediate, unique, different from that of the general public, and will not or cannot be adequately represented by any other party. Therefore, it will aid the Commission and protect and

¹ *In the Matter of the Laclede Gas Company's Request to Increase Its Revenues for Gas Service, et al.*, File No. GR-2017-0215, *et al.*, Report and Order at 56 (Feb. 21, 2018).

advance the public interest that EDF be permitted to intervene in this proceeding to protect its interest.

7. EDF seeks a full hearing with intervention, discovery, and evidence, consistent with a contested proceeding. EDF does not yet otherwise have a position relating to the relief sought by the Company and is continuing to review Spire Missouri's filing and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, EDF requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system on this 2nd day of December, 2020.

/s/ Lewis Mills