

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

**In the Matter of The Empire District Gas)
Company’s d/b/a Liberty Request to File Tariffs)
to Change Its Rates for Natural Gas Service)**

Case No. GR-2021-0320

**MISSOURI SCHOOL BOARDS’ ASSOCIATION
APPLICATION TO INTERVENE**

Comes Now the Missouri School Boards’ Association (hereinafter “MSBA”), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, and pursuant to 20 CSR 4240-2.075, files its Application to Intervene in the above referenced matter. In support of its Application, the MSBA states the following:

1. MSBA is a 501(c)(6) not-for-profit corporation representing approximately 390 school districts in the State of Missouri as a trade association, several of which are subject to Empire District Gas Company d/b/a Liberty’s (hereinafter “Empire”) natural gas tariff rates.

2. MSBA has organized a purchasing cooperative denominated MOPRC (Missouri Purchasing Resource Center); also known as the MSBA Natural Gas Consortium, which is the authorized purchasing agent for over 2,100 utility accounts which purchase natural gas on the open market which is delivered to the various schools and school districts in Missouri under the statutory School Transportation Program (hereinafter “STP”). There are currently 24 school districts on the Empire system and most have multiple Empire gas accounts that participate in MOPRC’s STP purchasing group.

3. MSBA further states that it is an interested, if not necessary, party to this proceeding as it is the largest STP association in the Empire service area and will be affected by tariff alterations incidental to this case, in particular as related to gas transportation to the schools.

4. Missouri Section 393.310 RSMo., clearly recognizes the direct involvement of schools in matters before the Commission dealing with gas corporations as relating to public school tariff filings, gas purchasing, gas resale, gas metering, and gas aggregation.

5. In addition, the Commission and parties will recognize this proceeding contains tariff provisions dealing with natural gas transportation service for schools and tariff provisions regarding the cost of providing monthly cash-out to eligible school entities and new eligible school entities which must comply with Missouri Section 393.310 RSMo. As such, this case presents a unique issue related to Empire and the MSBA schools.

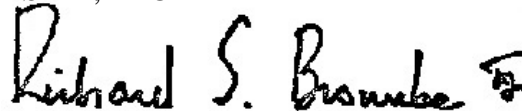
6. MSBA's interests in this filing are unique and cannot be reasonably represented by any other entity.

7. MSBA's requested intervention would serve the public interest, including numerous schools and school districts.

8. MSBA has been granted intervenor status in previous filings by the Public Service Commission in many gas utility cases and has actively participated in those proceedings.

WHEREFORE, the Missouri School Boards' Association requests that it be granted intervention on the above referenced matter.

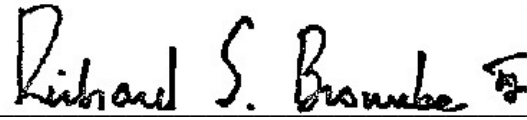
Respectfully submitted,
RSBIII, LLC



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 27th day of September, 2021.

A handwritten signature in black ink that reads "Richard S. Brownlee III" with a stylized flourish at the end. The signature is written over a horizontal line.

Richard S. Brownlee III, Attorney