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

In the Matter of Spire Missouri Inc.'s d/b/a Spire	
Request for Authority to Implement a General )	
Rate Increase for Natural Gas Service Provided in )	File No. GR-2022-0179
the Company's Missouri Service Areas.	

## APPLICATION TO INTERVENE BY THE CITY OF KANSAS CITY, MISSOURI

COMES NOW the City of Kansas City, Missouri (hereinafter "Kansas City" or "City"), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.075, and respectfully applies for intervention as a party in this natural gas rate case, initiated by Spire Missouri, Inc. ("Spire" or "Company"). In support of this application, Kansas City states as follows:

- 1. The City of Kansas City, Missouri, is a municipality of the State of Missouri.
- 2. Correspondence, communications, orders and the decision in this matter should be addressed to:

Matthew J. Gigliotti City Attorney 23rd Floor City Hall 414 E. 12th St. Kansas City, MO 64106 Tel.: (816) 513-3153

Fax: (816) 513-3133

E-Mail: matthew.gigliotti@kcmo.org

3. On April 1, 2022, Spire filed for a \$151.9 million rate increase. The matters to be considered in this case and the Commission's determinations thereon could have a direct and significant impact on the City. On April 4, 2022, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before April 25, 2022. This application is therefore timely.

4. Kansas City is itself a consumer of natural gas supplied by Spire and also a

consumer of natural gas supplied by other transporters/marketers via Spire's system pursuant to

Spire's transportation tariff. The City's interest in this proceeding is different from that of the

general public. It is interested in the impact of any decisions in this proceeding on behalf of itself,

its residents, businesses, and visitors whose interests, and the City's, may be adversely affected by

a final decision in this case. It desires to participate fully in this proceeding including hearing and

the briefing of the issues.

5. Kansas City believes that its participation in the matter will be important to the

other parties and would assist the Commission in any deliberations on the subject matter. Its

intervention is in the public interest.

6. At this time, Kansas City is uncertain of the position it will take in this matter.

WHEREFORE, for the foregoing reasons, the City of Kansas City, Missouri, respectfully

requests that the Commission grant its Application to Intervene, entitling it to fully participate in

this proceeding.

Respectfully submitted,

OFFICE OF THE CITY ATTORNEY

/s/ Matthew J. Gigliotti

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ATTORNEYS FOR CITY OF

KANSAS CITY, MISSOURI

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 25th day of April, 2022.

Respectfully submitted,

/s/ Matthew J. Gigliotti
Matthew J. Gigliotti