

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 BY THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.075, and respectfully applies for intervention as a party in this PGA case, initiated by Spire Missouri, Inc. (“Spire” or “Company”), for both its service territories in the state. In support of this application, Consumers Council states as follows:

1. Consumers Council is a nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri, and has participated in numerous cases at the Missouri Public Service Commission, including previous Laclede Gas Company and Spire rate cases.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

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3. Consumers Council's interest in this matter relates to the rates, terms and conditions of service for the Company's residential natural gas customers. This interest is different than the general public interest.

4. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for Company's residential gas customers. The issues in this matter have drawn our attention, and the organization desires the opportunity to conduct discovery in this matter. Consumers Council has already joined with other entities to express initial concerns, and the organization reserves the right to provide the Commission with more detailed positions in this rate case, following further review.

5. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

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

Respectfully submitted,

Dated: December 8, 2020

/s/ John B. Coffman

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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 listed on the official service list on this 8th day of December 2020.

/s/ John B. Coffman
