

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

In the Matter of the Joint Application of AIP Project)	
Franklin Bidco., Inc., Veolia Energy North America)	
Holdings, Inc., Thermal North America, Inc.,)	File No. HM-2020-0039
Veolia Energy Missouri, Inc., and Veolia Energy)	
Kansas City, Inc. for Approval of Indirect Merger)	
by Stock Acquisition and related Encumbrance.)	

MOTION OF SPIRE MISSOURI INC. TO INTERVENE

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and, pursuant to Commission Rule 4 CSR 240-2.075 and the order issued by the Missouri Public Service Commission on August 15, 2019, files this Motion to Intervene, respectfully stating as follows:

1. Spire Missouri is a corporation duly incorporated under the laws of the State of Missouri. The Company’s principal office is located at 700 Market Street, St. Louis, Missouri 63101. The contact information for Spire Missouri’s attorneys is set forth below.

2. Spire Missouri is a gas corporation and energy provider to 1.1 million customers, including Veolia Energy Kansas City (“VEKC”), an applicant in this proceeding. VEKC is Spire Missouri’s largest customer in its Spire Missouri West service territory.

3. As a Missouri gas utility and service provider to VEKC, Spire Missouri has an interest different from that of the general public. Although Spire Missouri does not currently know what position it will take in this case, its interests could be adversely affected by a final order issued in this case. Because of Spire Missouri’s unique perspective, the Company believes that granting its proposed intervention would serve the public interest.

WHEREFORE, Spire Missouri respectfully requests that the Commission issue its order granting this motion and permitting the Company to intervene and participate as a party in all respects in this proceeding.

Respectfully submitted,

Goldie T. Bockstruck

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ATTORNEYS FOR Spire Missouri Inc.

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Verified Motion of Spire Missouri Inc. was served on all counsel of record on this 26th day of August 2019 by hand-delivery, e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

/s/ Goldie T. Bockstruck