## BEFORE THE MISSOURI 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	)	File No. GR-2022-0179
General Rate Increase for Natural Gas	)	
Service Provided in the Company's	)	
Missouri Service Areas	)	

## 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(10), 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 390 school districts in the State of Missouri as a trade association, many of which are subject to Spire's natural gas tariff rates.
- 2. Section 393.310 RSMo is a special statutory provision for Missouri schools that clearly provides the direct involvement of schools in matters before the Commission dealing with gas corporations as relating to public school gas tariff filings, purchasing, resale, metering, and aggregation.
- 3. MSBA has organized a purchasing cooperative denominated MOPURC (Missouri Purchasing Resource Center); also known as the MSBA Natural Gas Consortium. This is the authorized purchasing agent for over 2,650 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 (STP).

- 4. MSBA's interest in this filing are unique and cannot be reasonably represented by any other entity.
- 5. MSBA's requested intervention would serve the public interest, including numerous schools and school districts.
- 6. MSBA has been granted intervenor status in previous Spire filings by the Commission in its many gas utility cases and has actively participated in those proceedings.

**WHEREFORE**, the Missouri School Boards' Association requests that it be granted intervention in the above referenced matter as set forth herein.

Respectfully submitted,

RSBIII, LLC

Richard S. Brownlee III, MO Bar #22422

Attorney for Missouri School Boards' Association

121 Madison Street

Jefferson City, MO 65101

(573) 616-1911

rbrownlee@rsblobby.com

## **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  $22^{nd}$  day of April 2022.

Richard S. Brownlee III, Attorney