

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

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

**SPIRE MISSOURI’S OBJECTION TO
UNIVERSITY OF MISSOURI’S MOTION TO INTERVENE**

Spire Missouri Inc. (“Spire Missouri” or the “Company”) respectfully objects to the motion to intervene by the University of Missouri (the “University”) and requests the Missouri Public Service Commission (“Commission”) deny the motion, and states the following:

1. On January 5, 2022, Spire Missouri filed its notice of intent to file a general rate case with the Commission. Spire Missouri filed its Direct Testimony in this case on April 1, 2022.

2. On April 4, 2022, the Commission issued its Order Directing Notice, Setting Intervention Deadline, Setting Time for Responses, and Directing Filing, which set an intervention deadline of April 25, 2022.

3. On October 12, 2022, over six months after the intervention deadline, the University filed its motion to intervene in the rate case.

4. Under 20 CSR 4240-2.075(10) motions to intervene after the intervention date may be granted upon showing of good cause.

5. To demonstrate good cause for granting its motion to intervene, the University appears to give several reasons: (1) Notice of the rate case did not properly reach the correct employee of the University until September 26, 2022, (2) the Company’s request will both significantly increase costs to the University and impede its ability to provide necessary and required services, (3) the University has a different interest from that of the general public, in that it represents the interest of higher education and research facilities, which is not currently

represented in this case, and (4) the public interest will be served by allowing the University's experience and insight to be part of this case.

6. Spire Missouri recognizes the University's impact on the State of Missouri and appreciates the partnerships that exist between Spire Missouri and the University. However, the Company objects to the University's untimely motion to intervene in the rate case, which has gone through the rebuttal phase of testimony and multiple settlement and technical conferences. Spire Missouri will address the University's supporting reasons for granting its intervention in turn.

7. First, the University states that it had not received notice of this rate case until September 26, 2022. Spire Missouri filed notice of this rate case on January 5, 2022, and filed its direct case on April 1, 2022. Eleven other parties have intervened in this case before direct testimony was filed, which the University, a sophisticated party, could have also done. Spire Missouri does not have an obligation to provide notice of its rate increase beyond filing its notice of intent with the Commission. However, this case has been well publicized in Missouri media, and notice of the filing of this case was provided by the Commission's data center to numerous public officials. If the University would be significantly affected by rate increases at the Commission, it would have been monitoring the regulatory body responsible for evaluating utility rate cases.

8. The University also states that the interest of higher education and research facilities are not currently represented in this case, but does not state why those interests are not represented. Spire Missouri serves the University system at two of its campuses, which are large natural gas users. Similarly situated parties have already intervened in this case, including Midwest Energy Consumers, Missouri Industrial Energy Consumers, Missouri School Boards' Association, and numerous gas marketers that provide natural gas supply for large customers. These parties

represent the interests of commercial and industrial customers that are comparable to the University, and belong to similar rate classes. Thus, Spire Missouri believes that the University is already adequately represented in this case.

9. Finally, the addition of University as a party to this case, at such a late hour, will not serve to further the public interest. All parties to the regulatory process benefit from predictability and consistency. At this late stage of the case, parties' have based their positions on the significant discovery, testimony, technical and settlement conferences that have occurred in the case to date. The addition of a new, redundant party sets a poor precedent for late intervenors in similar cases in the future. The Commission should not allow potential intervenors to sit on their hands and intervene at the last moment, potentially interjected new issues into the proceeding.

WHEREFORE, Spire Missouri respectfully requests that the Commission deny the University of Missouri's untimely motion to intervene as good cause has not been shown.

Respectfully submitted,

/s/ J. Antonio Arias

Matthew Aplington MoBar #58565
General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0785 (Office)
Email: matt.aplington@spireenergy.com

J. Antonio Arias, MoBar #74475
Counsel, Regulatory
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0655 (Office)
Email: antonio.arias@spireenergy.com

ATTORNEYS FOR SPIRE MISSOURI, INC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record on this 24th day of October, 2022.

/s/ Julie Trachsel

Julie Trachsel