

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

In the Matter of the Application of Spire Missouri, Inc. )  
to Change its Infrastructure System Replacement ) **File No. GO-2019-0356**  
Surcharge in its Spire Missouri East Service Territory )

In the Matter of the Application of Spire Missouri, Inc. )  
to Change its Infrastructure System Replacement ) **File No. GO-2019-0357**  
Surcharge in its Spire Missouri West Service Territory )

**APPLICATION TO INTERVENE**

COMES NOW the City of St. Joseph, Missouri, by and through counsel, and files its Application to Intervene in these cases pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

1. The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
2. All communications and pleadings in this case should be served on:

Bryan Carter  
City Attorney  
City Hall, Room 307  
1100 Frederick Avenue  
St. Joseph, MO 64501  
Phone: 816-271-4680  
Facsimile: 816-271-4683  
E-mail: bcarter@stjoemo.org

and

William D. Steinmeier  
WILLIAM D. STEINMEIER, P.C.  
2031 Tower Drive, P.O. Box 104595  
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3. On July 17, 2019, the Commission issued its *Order Directing Notice, Setting Intervention Deadline, and Directing Filings* in these cases, establishing July 26, 2019 as the deadline for applications to intervene. Thus, the instant *Application to Intervene* is timely.
4. The City of St. Joseph is a large consumer of natural gas supplied by Spire West and would be affected by the tariffs at issue in these cases. The City is also a governmental body representing the residents and commercial interests of the City. For these reasons, the City of St. Joseph has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising out of this case. Granting the instant *Application to Intervene* would serve the public interest.
5. The City of St. Joseph states that it is still reviewing the Companies' filings in these cases and does not yet take a position on the proposed tariffs.

WHEREFORE, the City of St. Joseph, Missouri respectfully requests that the Missouri Public Service Commission grant this Application to Intervene and make St. Joseph a party to these proceedings.

Respectfully submitted,

*/s/ William D. Steinmeier*

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COUNSEL FOR THE CITY OF ST.  
JOSEPH, MISSOURI

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at [staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)), on the Office of the Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)) and on all parties of record on this 26<sup>th</sup> day of July 2019.

*/s/ William D. Steinmeier*

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William D. Steinmeier