

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company’s Request to Increase Its Revenue for Gas Service.) **File No. GR-2017-0215**
) **Tariff No. YG-2017-0195**

In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy’s Request to Increase Its Revenues for Gas Service.) **File No. GR-2017-0216**
) **Tariff No. YG-2017-0196**
)

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 4 CSR 240-2.075, and respectfully applies for intervention¹ as a party in this general rate case, initiated by Laclede Gas Company, also d/b/a “Missouri Gas Energy (“MGE”) and also as “Spire”, (“Company”), requesting an annual revenue requirement increase for both its Laclede Gas and Missouri Gas Company service territories. 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 rate cases.
2. Correspondence, communications, orders and the decision in this matter should be addressed to:

¹ Consumers Council managed to file this Application for Intervention within the prescribed 10-day deadline. However, intervention deadlines this short cause a hardship for many organizations and businesses due to the difficulty in responding so quickly. For instance, the Consumers Council Board only meets once a month and thus to receive Board approval for intervention, a special meeting is required. Counsel is not aware of any other state PUC that issues intervention deadlines as short as 10 days. Many state PUCs have no intervention deadline, simply requiring intervenors to accept the procedural schedule as it is upon intervention. A 30-day intervention deadline would make PSC actions more accessible to potential public interest participants.

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

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 extremely short intervention deadline issued for this case has not yet allowed for further identification of potential contested issues. Consumers Council reserves the right to provide the Commission with more detailed positions in this rate case, following further review of the testimony and supporting materials.

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: May 1, 2017

/s/ John B. Coffman

John B. Coffman MBE #36591
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net
Attorney for the Consumers Council of Missouri

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 1st day of May 2017.

/s/ John B. Coffman
