

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

**In the Matter of Spire Missouri Inc.’s)
Verified Application for an Accounting) Case No. GU-2020-0376
Authority Order Related to COVID-19)
Impacts)**

APPLICATION TO INTERVENE

COMES NOW the Midwest Energy Consumers’ Group (“MECG”), pursuant to the Commission’s May 19, 2020 *Order and Notice*, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of electricity, water and natural gas throughout the State of Missouri including the area served by Spire Missouri.

2. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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3. On May 18, 2020, Spire filed an Application for an Accounting Authority Order seeking to defer costs and lost revenues associated with the Covid-19 pandemic. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on cost of service to large commercial and industrial customers. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in the development of a more complete record. MECG’s interest is direct,

immediate, unique, different from that of the general public, and will not or cannot adequately be represented by any other party. Therefore, it will aid the Commission and protect and advance the public interest that MECG be permitted to intervene in this proceeding.

4. MECG opposes the issuance of an Accounting Authority Order. While the Commission has allowed for the deferral of costs associated with an extraordinary event, the Commission has typically rejected any request for “lost revenues” as Spire now seeks. For instance, while allowing Spire West to defer incremental costs, the Commission rejected Spire’s request to defer alleged “lost revenues” associated with the Joplin tornado.

In support of recording ungenerated revenue on a deferred basis, the Company urges the Commission to look only at whether the tornado was extraordinary. Staff and OPC argue that the AAO sought would not only allow the recording of an item, it would create the item recorded. Staff and OPC are correct.

Actual expenditures exist in the past, present, or future and represent an exchange of value that the Company must record. Ordinarily, the Company records them currently and, if they are extraordinary, the Company must record them in Account 182.3.

The Company’s claim is different. Ungenerated revenue never has existed, never does exist, and never will exist. Revenue not generated, from service not provided, represents no exchange of value. There is neither revenue nor cost to record, in the current period nor in any other.¹

Ultimately, Spire should realize that it is part of the Missouri community and, instead of attempting to insulate itself by shifting any costs / lost revenues on to its suffering customer base, Spire should seek to share in the struggles of its service area.

WHEREFORE, MECG prays: (a) that it be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings, to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

¹ Report and Order, Case No. GU-2011-0392, Report and Order, issued January 25, 2012, at page 23-25.

Respectfully submitted,

WOODSMALL LAW OFFICE

/s/ David Woodsmall

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ATTORNEY FOR THE MIDWEST
ENERGY CONSUMERS GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ David Woodsmall

David Woodsmall

Dated: May 23, 2020