

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

In the Matter of Spire Missouri, Inc.)
d/b/a Spire (East) Purchased Gas)
Adjustment (PGA) Tariff Filing) **File No. GR-2021-0127**

In the Matter of Spire Missouri, Inc.)
d/b/a Spire (West) Purchased Gas)
Adjustment (PGA) Tariff Filing) **File No. GR-2021-0128**

APPLICATION TO INTERVENE

COMES NOW the Midwest Energy Consumers’ Group (“MECG”), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure, 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 and natural gas throughout the State of Missouri including in the area served by Spire East and Spire West.

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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Voice: (573) 797-0005
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3. On October 30, 2020, Spire filed its Purchased Gas Adjustment or Actual Cost Adjustment (“PGA / ACA”) for 2019-2020. 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 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 to protect its interest.

4. For purposes of 20 CSR 4240-2.075(2), MECG states that it is opposed to rate increases that are not reasonable and are not related to prudent costs. MECG is continuing to review Laclede's filing and reserves the right to take positions on specific issues as this case proceeds.

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.

Respectfully submitted,

WOODSMALL LAW OFFICE

/s/ David Woodsmall

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ATTORNEY FOR 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: December 3, 2020