

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

In the Matter of Spire Missouri Inc.'s d/b/a )  
Spire Request for Authority to Implement a ) Case No. GR-2021-0108  
General Rate Increase for Natural Gas Service )  
Provided in the Company's Missouri Service Areas )

**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, water and natural gas throughout the State of Missouri including in 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:

David L. Woodsmall  
Woodsmall Law Office  
308 E. High Street, Suite 204  
Jefferson City, MO 65101  
Voice: (573) 797-0005  
E-mail: [david.woodsmall@woodsmalllaw.com](mailto:david.woodsmall@woodsmalllaw.com)

3. On December 11, 2017, Laclede filed for a \$64.2 million rate increase. 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 discriminatory pricing of gas and related utility services, is opposed to increases that are not reasonable and are not related to prudent costs that are incurred by the utility in providing utility service, and is opposed to a utility being permitted to earn what may be an unreasonably high rate of return. MECG is unable to state its position relating to the relief sought by Spire Missouri and is continuing to review Spire'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

David L. Woodsmall Mo. Bar #40747  
308 E. High Street, Suite 204  
Jefferson City, Missouri 65101  
(573) 797-0005  
Email: david.woodsmall@woodsmalllaw.com

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 11, 2020