

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

**In the Matter of Spire Missouri Inc.'s)
d/b/a Spire Proposed School)
Transportation Tariff Filing)**

Case No. GT-2020-0187

**MISSOURI SCHOOL BOARDS' ASSOCIATION
COMMENTS**

Comes Now the Missouri School Boards' Association (hereinafter "MSBA"), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, files its comments in the above referenced matter. In support, the MSBA states the following:

1. On December 18, 2019, Spire Missouri, Inc. (hereinafter "Spire-East") filed a revised tariff sheet, P.S.C. MO No. 7 First Revised Sheet No. 15.1 (JG-2020-0105) to change the current requirement of Spire-East to only release Mississippi River Transmission (MRT) capacity to the schools as part of its tariffed school transportation program. Tariff Sheet 15.1 bears an effective date of January 17, 2020.

2. On December 31, 2019, Missouri Public Service Commission Staff (hereinafter "Staff") filed a Motion to Open Docket and Suspend Tariff Sheet for Additional 120 Days.

3. By Order dated December 31, 2019, the Commission issued its Order Directing parties to file comments by January 9, 2020. Although MSBA is not a party, it has a special and unique interest to this proceeding and anticipates it will be filing an Intervention to be made a party as the matter proceeds.

4. On January 6, 2020, Spire-East filed a Response to Staff's Motion to Open Docket and Suspend Tariff Sheet for Additional 120 Days.

5. MSBA is a 501(c)(6) not for profit corporation representing elementary and secondary schools in the State of Missouri as a trade association. MSBA represents eligible school entities (hereinafter “the Schools”) pursuant to Section 393.310 RSMo., and has organized a purchasing cooperative denominated MOPURC (Missouri Purchasing Resource Center). It is the authorized purchasing agent for a total of approximately 2,330 school accounts in Missouri, with 704 Spire-East accounts, which represents approximately 60% of the state-wide school natural gas volumes delivered under Commission-approved rates for the Spire-East system. MSBA schools are also users of pipeline capacity released by Spire-East.

6. MSBA’s interest in this proceeding is unique and different from the public in general. MSBA has been granted intervenor status in similar filings dealing with pipeline capacity and service from Spire-East and other utilities and has actively participated in those proceedings at the Commission.

7. MSBA comments:

a. Section 393.310 RSMo., paragraphs (1) and (2), (see Appendix 1), is clear that:

i. the subject Spire-East filing is not preferential to large industrial or commercial basic transportation customers in general but is only applicable to eligible school entities, typically with relatively small annual usage of less than 100,000 therms;

ii. Missouri gas corporations must charge eligible school entities at the gas corporation's cost of purchasing gas transportation capacity;

iii. the commission shall treat the gas corporation's pipeline capacity costs for associated eligible school entities in the same manner as for large

industrial or commercial basic transportation customers, which shall not be considered a negative financial impact on the gas corporation, its other customers, or local taxing authorities, and the commission may adopt by order such other procedures not inconsistent with this section which the commission determines are reasonable or necessary to administer the experimental program.

b. Large industrial or commercial basic transportation customers in general are not required to take any capacity from Spire-East. Thus, per statute, eligible school entities are not required to take Spire-East released capacity from any pipeline. Practically, MSBA has agreed to do so during the history of the program and plans to continue doing so for the foreseeable future.

c. Heretofore, MSBA has, in fairness to PGA customers, agreed to only take Spire-East released capacity on the Enable-MRT pipeline when other lower cost pipeline capacity on Panhandle Eastern and Southern Star pipelines has been available to about 15% of the Spire-East system.

d. Further, heretofore, MSBA has agreed to pay maximum FERC-approved Enable-MRT capacity rates which may be greater than the gas corporation's actual cost, with all excess MSBA payments being passed through by Spire-East to the benefit of PGA customers. For the foreseeable future, MSBA will continue to select Spire-East released capacity on either the Enable-MRT or the recently constructed St. Louis pipeline at maximum FERC-approved rates and voluntarily agree to forgo its rightful 15% capacity allocation of Spire-East capacity on lower-cost Panhandle Eastern and Southern Star pipelines.

WHEREFORE, the Missouri School Boards' Association requests approval of the tariff as suggested herein.

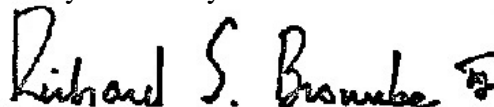
Respectfully submitted,
RSBIII, LLC



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 9th day of January 2020.



Richard S. Brownlee III, Attorney