

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

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

**APPLICATION TO INTERVENE OUT OF TIME
OF THE MISSOURI PROPANE GAS ASSOCIATION**

COMES NOW the Missouri Propane Gas Association (“MPGA”), by and through counsel, pursuant to Commission Rule 4 CSR 4240-2.075, and respectfully files its Application to Intervene in this matter. In support of this Application, MPGA states as follows:

1. MPGA is a not-for-profit trade association representing its local propane provider members and affiliated businesses who sell propane or propane appliances and equipment in Missouri. Through advocacy, education, and leadership, MPGA assists its members by supporting beneficial public policy, promoting safety education, and raising public awareness of the benefits of propane.

2. MPGA members are small business owners. They have payrolls to meet and bills to pay and exist to provide safe and affordable propane products and services to their customers.

3. Correspondence, communications, orders, and the decision in this matter should be addressed to:

Terry M. Jarrett
Healy Law Offices, LLC
514 E. High St., Suite 22
Jefferson City, Missouri 65101
Telephone: (573) 415-8379
Facsimile: (573) 415-8379
terry@healylawoffices.com

4. MPGA seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075. Pursuant to 4 CSR 240-2.075(10) the Commission is authorized to grant the instant application after the January 12, 2021, intervention date, “upon a showing of good cause.”

5. In some instances, MPGA propane provider members compete with investor-owned natural gas utilities for customers. As such, MPGA represents members that may be affected by Orders entered by the Commission in this proceeding, and accordingly, MGPA and those members are interested parties in this proceeding. MPGA and the members it represents have a direct interest in this proceeding which is different from that of the general public, and which interests cannot be adequately represented by any other party.

6. Specifically, in this proceeding, Spire Missouri Inc. (“Spire”) is seeking tariff approval for a new gas expansion program – The Growing Missouri Program (“GMP”). Currently, gas expansion projects must meet a specified rate of return to be economically viable. GMP will provide an incentive for the utility to extend gas service for rural expansion projects that otherwise would not be economically feasible. As proposed, the GMP would be included in the rate base of a future rate proceeding – so the financial burden will be shouldered by ratepayers, not shareholders.

7. If a Commission-regulated electric utility like Spire is allowed to receive support from ratepayers for a new expansion project, then the competitive balance between Spire and MPGA’s local propane provider members could be skewed to the natural gas utility’s favor. The proposed incentives program could directly and negatively impact MPGA’s member propane providers. MPGA opposes any proposal that would interfere with free market competition.

8. MPGA hereby affirmatively accepts the record established in this case, including the requirements of any orders of the Commission, as of the date the instant Application is filed.

9. No party to this matter will be adversely impacted or prejudiced by granting this Application to Intervene. MPGA has acted as expeditiously as possible to submit the instant Application to Intervene upon learning of the instant filing with the Commission.

WHEREFORE, MPGA respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully submitted,

HEALY LAW OFFICES, LLC



Terry M. Jarrett, MO Bar No. 45663

514 E. High St., Suite 22
Jefferson City, Missouri 65101
Telephone: (573) 415-8379
Facsimile: (573) 415-8379
terry@healylawoffices.com

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 25th day of January, 2021.



Terry M. Jarrett