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

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In the Matter of the Propriety of the Rate Schedules for Gas Service of The Empire District Gas Company

File No. GR-2018-0229

## MISSOURI SCHOOL BOARDS' ASSOCIATION APPLICATION TO INTERVENE

Comes Now the Missouri School Boards' Association (hereinafter "MSBA"), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, and pursuant to 4 CSR 240.2-075, files its Application to Intervene in the above referenced matter. In support of its Application, the MSBA states the following:

1. On February 16, 2018, Staff of the Missouri Public Service Commission filed a Motion to Open Rate Case and to Require The Empire District Gas Company (hereinafter "Empire") to Show Cause. The basis of the filing was the recent federal enactment of the Tax Cuts and Jobs Act of 2017, and the affect this law may have on tariffs and service charges Empire has with all customer classes, including tariff and service charges to the schools represented by the MSBA.

2. MSBA is a 501(c)(6) not-for-profit corporation representing 387 elementary and secondary schools in the State of Missouri as a trade association, consisting of approximately 139 school district accounts in the Empire service territory.

3. MSBA has organized a purchasing cooperative denominated MOPURC (Missouri Purchasing Resource Center); also known as the MSBA Natural Gas Consortium, which is the authorized purchasing agent for over 2,650 utility accounts which purchase natural gas on the open market which is delivered to the various schools and school districts in Missouri under the

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statutory School Transportation Program (hereinafter "STP"). There are currently 139 Empire accounts that participate in MOPUR's STP purchasing group.

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5. MSBA further states that it is an interested, if not necessary, party to this proceeding as it is the largest STP association in the Empire service area and will be affected by tariff alterations incidental to this case.

6. MSBA's interest in this proceeding is unique and different from the public in general.

7. MSBA's requested intervention would serve the public interest.

8. MSBA has been granted intervenor status in previous filings by the Public Service Commission in other Empire utility cases and has actively participated in those proceedings.

**WHEREFORE**, the Missouri School Boards' Association requests that it be granted intervention on the above referenced matter.

Respectfully submitted, RSBIII, LLC

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## **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served electronically to all parties on the official service list for this case on this  $1^{st}$  day of March, 2018.

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Richard S. Brownlee III, Attorney