BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Spire Missouri)	
Inc. for a Variance of its Tariff Rules and)	Case No. GE-2023-0393
Regulations for Resale of Natural Gas)	

APPLICATION TO INTERVENE OF THE CITY OF KANSAS CITY, MISSOURI

COMES NOW, the City of Kansas City, Missouri (hereinafter Kansas City), and pursuant to 20 CSR 4240-2.075 of the Rules of Practice and Procedure, applies to intervene in the above case and applies for an Order permitting late intervention. For its Application, Kansas City states:

- 1. Kansas City is a municipality of the State of Missouri.
- 2. Correspondence, communication, orders and the decision in this matter should be addressed to:

James P. Zakoura, MO 66799 Special Counsel Foulston Siefkin LLP 7500 College Blvd. Suite 1400 Overland Park, Kansas 66210

Phone: 913-253-2142

Email: <u>jzakoura@foulston.com</u>

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Senior Associate City Attorney
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- 3. This case arose when Spire Missouri, Inc. ("Spire"), filed proposed tariff variations to Tariff Sheet No. R-8, 8. Resale ("Resale Provision"), applicable to the resale of natural gas.
- 4. On May 25, 2023, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before June 21, 2023. This application is late filed and is seeking late filed intervention in this matter.
- 5. Kansas City, acting through several departments and affiliated agencies, is itself a consumer of natural gas provided by Spire. Specifically, Kansas City is interested in the impact of any decisions in this proceeding as it pertains to the new Kansas City International Airport ("KCI") on behalf of itself, its residents, businesses or visitors, whose interests, and the City's may be affected by a final decision in this case. Kansas City desires to participate in this proceeding including hearing and briefing of the issues.
- 6. The City believes its participation in the matter will be important to the other parties and would assist the Commission in any deliberations on the subject matter. Further, Kansas City's intervention is in the public interest, Spire's variance request is for Kansas City facilities, and directly impacts the City.
- 7. At this time, Kansas City is generally supportive of the Commission granting the variance Spire has requested.

WHEREFORE, for the foregoing reasons, the City of Kansas City, Missouri respectfully requests that the Commission grant its late filed Application to Intervene in this matter, and thereby entitle the City to have notice and to appear at taking of testimony, to produce and cross-examine witnesses, to be heard on the argument, and in all other respects fully participate in this proceeding.

Respectfully submitted.

/s/ James P. Zakoura

James P. Zakoura Special Counsel Foulston Siefkin LLP 7500 College Blvd. Suite 1400 Overland Park, Kansas 66210

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Attorneys for the City of Kansas City, Missouri

VERIFICATION

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

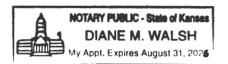
James P. Zakoura, being duly sworn upon his oath, deposes and states that he is one of the Attorney for the City of Kansas City, Missouri., that he has read and is familiar with the foregoing Application to Intervene of The City of Kansas City, Missouri, and that the statements therein are true to the best of his knowledge, information, and belief.

James P. Zakoura

SUBSCRIBED AND SWORN to before me this 30th day of June 2023.

Notary Public

My Appointment Expires:



CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of June 2023, the foregoing pleading was electronically filed with the Missouri Public Service Commission and that one copy was delivered electronically to all parties as follows:

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/s/ James P. Zakoura

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