

**BEFORE THE MISSOURI 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)	File No. GR-2021-0108
General Rate Increase for Natural Gas)	
Service Provided in the Company’s)	
Missouri Service Areas)	

MISSOURI SCHOOL BOARDS’ ASSOCIATION
APPLICATION TO INTERVENE
OUT OF TIME

Comes Now the Missouri School Boards’ Association (hereinafter “MSBA”), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, and pursuant to 20 CSR 4240-2.075(10), files its Application to Intervene Out of Time in the above referenced matter. In support of its Application, the MSBA states the following:

A. Background MSBA

1. MSBA is a 501(c)(6) not-for-profit corporation representing 390 school districts in the State of Missouri as a trade association, many of which are subject to Spire’s natural gas tariff rates.
2. Missouri Section 393.310 RSMo., clearly recognizes the direct involvement of schools in matters before the Commission dealing with gas corporations as relating to public school tariff filings, gas purchasing, gas resale, gas metering, and gas aggregation.
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 statutory School Transportation Program (hereinafter “STP”).

B. Application to Intervene Out of Time

4. On or about December 23, 2020 the Commission issued an Order in this new rate case setting deadlines to intervene, procedural orders, etc. Although the MSBA has participated in all of the filed natural gas cases at the Commission since the late 1990's, we were omitted from the service list in this case in the December 23, 2021 Order. As such, MSBA had no notice of the actual filing of the case, the dates for intervention, procedural schedules and meetings, or any other orders or activity. This omission prevented MSBA from filing a timely Application to Intervene in this case. As a direct consequence, we are filing this present motion out of time, all of which is supported by good cause. MSBA first learned of this case on February 9, 2021, in discussions with applicant Spire. This filing is made as expeditiously as possible under the circumstances, which supports an Order of good cause.

5. MSBA also knows the School Transportation Tariff (STP) issues will be an integral part of this rate case proceeding, which supports the conclusion that MSBA is a necessary party to this gas case, all of which supports an Order of Intervention for good cause.

6. MSBA states it will take the case as is, including all proceedings that have occurred, including the establishment of the procedural schedule.

7. MSBA states that Spire has agreed to this late intervention application being granted.

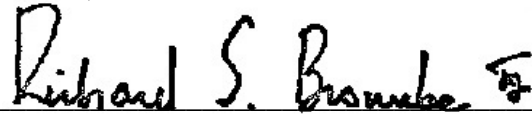
8. MSBA states that they have been contacted by all other parties and all have agreed to or have no objection to this late intervention application being granted.

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

10. MSBA's requested late intervention would serve the public interest and the schools in the State of Missouri, all of which supports the intervention for good cause.

WHEREFORE, the Missouri School Boards' Association requests that it be granted intervention in the above referenced matter as set forth 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 10th day of February 2021.



Richard S. Brownlee III, Attorney