

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

**In the Matter of the Application of Spire Missouri Inc. d/b/a Spire to Change its Infrastructure System Replacement Surcharge in its Spire Missouri East Service Territory** ) Case No. GO-2021-0030  
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**In the Matter of the Application of Spire Missouri Inc. d/b/a Spire to Change its Infrastructure System Replacement Surcharge in its Spire Missouri West Service Territory** ) Case No. GO-2021-0031  
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**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 20 CSR 4240-2.075, files its Application to Intervene in the above referenced matters. In support of its Application, the MSBA states the following:

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. On August 4, 2020, Spire Missouri Inc. (hereinafter "Spire") filed an Application and Petition to change its infrastructure system replacement surcharge (hereinafter "ISRS") for both its West and East service territory.
4. Issuance of such an Order may impact Spire's future tariff rates to be paid by over 1,600 MSBA Natural Gas Consortium participants served by Spire Missouri Inc.

5. MSBA's interests in this filing are unique and cannot be reasonably represented by any other entity.

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

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

Respectfully submitted,  
RSBIII, LLC

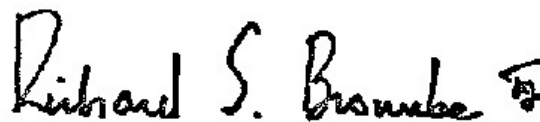


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**CERTIFICATE OF SERVICE**

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 18<sup>th</sup> day of August, 2020.



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Richard S. Brownlee III, Attorney