

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

**In the Matter of Laclede Gas Company    )**  
**Missouri Gas Energy’s Purchased Gas    )**  
**Adjustment Tariff Filing                    )**       **Case No. GR-2014-0324**  
  )

**MISSOURI SCHOOL BOARDS’ ASSOCIATION**  
**APPLICATION TO INTERVENE AND MOTION TO**  
**SUSPEND PARTIAL STIPULATION AND AGREEMENT**

Comes Now the Missouri School Boards’ Association (hereinafter “MSBA”), by and through counsel, RSBIII, LLC, Richard S. Brownlee, III, and pursuant to Section 393.310 RSMo. and 4 CSR 240.2-075, files its Application to Intervene and Motion to Suspend Partial Stipulation and Agreement in the above referenced matter. In support of its Application, the MSBA states the following:

1. MSBA is a 501(c)(6) Missouri not-for-profit corporation representing over 500 elementary and secondary school districts in the State of Missouri as a trade association. Missouri statute, Section 393.310 RSMo., clearly recognize 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.

2. On February 22, 2017, Missouri Gas Energy (hereinafter “MGE”), an operating unit of Laclede Gas Company, and Staff filed a Partial Stipulation and Agreement with the Commission asking for approval of a Partial Stipulation and Agreement (Stipulation). The entire subject matter of the Stipulation relates to MSBA’s school transportation program. MGE and the Commission Staff are signatories to the Stipulation. MSBA is not a signatory to the Stipulation. Many of the schools and school districts are negatively affected by this filing.

3. The Stipulation generally provides for issues related to a 2014 ACA proceeding be resolved in MGE's next full rate case, which appears to be scheduled for filing with the Commission within the next month.

4. With one significant exception, MSBA supports the Stipulation. However, the Stipulation, at paragraph 3a, provides for an automatic increase in charges to MSBA school program participants in terms of the balancing fee. This is all without notice to, due process for, or agreement with MSBA and its school members who are customers of MGE. This is also done without any cost support, and without an opportunity for affected parties to challenge the proposed increase.

5. MSBA further believes the proposed tariff change could lead to telemetry or special metering, all of which is prohibited by Section 393.310-4(3) RSMo.

6. MSBA requests that the Commission:

- (a) Disallow the Stipulation as it relates to the balancing fee increase; or
- (b) Issue an Order which includes the same requirements as the proposed Stipulation, except without an automatic increase and with a provision that these matters be addressed in MGE's next rate case; and
- (c) Schedule a conference with all parties to the Stipulation including MSBA to discuss the matters raised herein

7. For good cause being shown, MSBA requests an Order Granting Intervention.

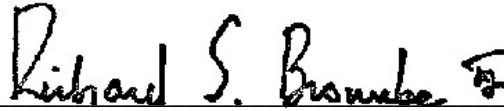
8. MSBA's interest in this proceeding is unique and different from the public in general.

9. MSBA's requested intervention would serve the public interest, including many of the public schools and public school districts.

10. MSBA has been granted intervenor status in similar filings by other utilities and has actively participated in those proceedings.

**WHEREFORE**, the Missouri School Boards' Association requests that it be granted intervention and further relief as referenced above.

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 13<sup>th</sup> day of March, 2017.



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Richard S. Brownlee III, Attorney