

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

In the Matter of the Application of Laclede)
Gas Company to Transfer an Asset to Spire)
Pipeline, Inc.)

Case No. GM-2017-0018

**APPLICATION TO INTERVENE
OF ENABLE MISSISSIPPI RIVER TRANSMISSION, LLC**

COMES NOW Enable Mississippi River Transmission, LLC (“MRT”), and in accordance with Commission Rule 4 CSR 240-2.075, applies to intervene and become a party in the above-referenced case. In support of this Application to Intervene, MRT respectfully states as follows:

1. MRT’s exact legal name is Enable Mississippi River Transmission, LLC. MRT is a limited liability corporation organized and existing under the laws of the State of Delaware. Its principal office is located at 1111 Louisiana Street, Houston, Texas 77002. MRT is a wholly-owned subsidiary of Enable Midstream Partners, LP, which is a publicly traded limited partnership of which Enable GP, LLC is the General Partner. Enable GP, LLC is jointly owned by CenterPoint Energy, Inc. and OGE Energy Corp. MRT is a natural gas company within the meaning of the Natural Gas Act and is subject to the regulatory jurisdiction of the Federal Energy Regulatory Commission. MRT provides open-access transportation services, including storage services, and transports natural gas to local distribution companies and to industrial customers for their own use and consumption in the states of Arkansas, Illinois, Louisiana, Missouri and Texas.

2. In its application, Laclede Gas Company (“Laclede”) requests authorization from the Commission to sell an approximately nine-mile segment of its Line 880 to its affiliate Spire

STL Pipeline LLC (“Spire STL Pipeline”) and requests any necessary variance from certain requirements of the Commission’s affiliate transactions rules. Spire STL Pipeline is proposing to develop a new interstate natural gas pipeline, which will start at an interconnect point with the Rockies Express Pipeline in Scott County, Illinois and end in St. Louis, Missouri. If the Commission approves Laclede’s application, the Line 880 Segment will be sold to Spire STL Pipeline and incorporated into the proposed new pipeline.

3. MRT has provided Laclede and other customers in the St. Louis area with reliable natural gas transportation service for over 80 years. Throughout this 80-year period, MRT’s service to the St. Louis area has never been interrupted as the result of an earthquake. MRT currently provides natural gas transportation service from diverse supply basins, including the supply areas Spire STL Pipeline proposes to access. MRT delivers natural gas to Laclede at multiple points, including at the Chain of Rocks point, which Laclede describes as a “takepoint.” Currently, the Chain of Rocks point is a uni-directional takepoint, enabling Laclede to receive natural gas from MRT into Line 880. According to Laclede, transferring the Line 880 Segment to Spire STL Pipeline will “allow for a bi-directional interconnect to be made with Laclede’s largest existing pipeline supplier, Enable MRT.”¹ Laclede states that it has taken steps to ensure that it receives firm transportation capacity over the 880 Line Segment up to its contract entitlements on Spire STL Pipeline, with “bi-directional flexibility.”

4. The Line 880 Segment connects directly to MRT. Laclede states that after acquiring the Line 880 Segment, Spire STL Pipeline will upgrade the line segment and convert the existing Chain of Rocks takepoint into a bi-directional pipeline-to-pipeline interconnection point. However, because the Chain of Rocks point is an MRT-owned asset, Spire STL Pipeline

¹ See Laclede Application at 5.

does not have the unilateral right or ability to convert the existing point to a bi-directional interconnection point. Only MRT can make that alteration to the facilities. Laclede provides no information about the actions that MRT and Spire STL Pipeline must take to convert Chain of Rocks into a bi-directional interconnection point or about the costs they must incur to do so. The transfer and upgrade of the Line 880 Segment and the conversion of the Chain of Rocks takepoint to a bi-directional interconnection point will have commercial and operational impacts on MRT, and MRT has not yet fully evaluated all of these impacts. If MRT is unable to mitigate the effects of Laclede's proposal, these impacts could increase the cost MRT incurs to provide service to Laclede and other customers in the St. Louis area.

5. Laclede claims that the operation of Line 880 will have no adverse impacts on safety or reliability. Laclede bases this conclusion on a review of "plans and specifications, along with system flow models which include the anticipated pressures, gas flows and other relevant data."² Laclede's application includes no details about these system flow models. It appears that these models assume that MRT and Spire STL Pipeline will successfully convert the Chain of Rocks takepoint into a bi-directional pipeline interconnection point. The application also is silent about how changes in the operation of the Chain of Rocks point and the Line 880 Segment will impact the MRT system and Laclede's storage facility located on Line 880.

6. For the reasons stated above, MRT has an interest in this proceeding different from that of the general public and which cannot be adequately represented by any other party. Furthermore, granting this application to intervene will serve the public interest because MRT's facilities and operations will be affected by the planned upgrade of the Line 880 Segment, the

² See Direct Testimony of Craig R. Hoeflerlin at 3, lines 8-10.

operation of the Line 880 segment as a bi-directional interstate pipeline, and the planned changes to the Chain of Rocks takepoint.

7. For the reasons discussed above, MRT does not currently have sufficient information to take a position in favor of or opposed to Laclede's application for authority to sell assets and for a variance from the Commission's affiliate transaction rules. Nonetheless, given the lack of information provided by Laclede in its application and supporting material, MRT is concerned that decisions or orders of the Commission in this proceeding could adversely affect MRT. MRT reserves the right to assert a position after it has had an adequate opportunity to examine the record, including any additional documentation submitted by Laclede or by other parties to this proceeding.

8. All correspondences, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

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WHEREFORE, MRT respectfully requests that the Commission grant its Application to Intervene in this proceeding.

Respectfully submitted,

/s/ Lindsay A. Hedrick
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CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing has been served on all parties on the official service list for this case on this 21st day of November, 2016.

/s/ Lindsay A. Hedrick

Lindsay A. Hedrick