

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

**In the Matter of Laclede Gas Company    )  
d/b/a Missouri Gas Energy's Request to    )  
Increase Its Revenues for Gas Service    )**

**Case No. GR-2017-0216**

**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 4 CSR 240.2-075, files its Application to Intervene in the above referenced matter. In support of its Application, the MSBA states the following:

1. On April 11, 2017, Laclede Gas Company, d/b/a Missouri Gas Energy (hereinafter "MGE") filed tariffs designed to increase natural gas rates for Missouri jurisdictional customers.

2. MSBA is a 501(c)(6) not-for-profit corporation representing 387 elementary and secondary schools in the State of Missouri as a trade association, consisting of approximately 120 school districts in the MGE service territory.

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 the 269 participants 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").

4. MSBA further states that MGE recognizes the interest of MSBA as an interested, if not necessary, party to this proceeding as it is the largest STP association in the MGE service territory. Further, under the Partial Stipulation and Agreement filed in related case GR-2014-

0324, MGE agrees to provide information on the costs and benefits of reading capability of STP customers, metering charges, metering costs, and metering benefits from any changes. All of this applies to the cost of service to MSBA as an STP customer in this proposed tariff filing. (cf. Noack Testimony, pp. 23 thru 27).

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

6. MSBA's requested intervention would serve the public interest.

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

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

Respectfully submitted,  
RSBIII, LLC



Richard S. Brownlee III, MO Bar #22422  
Attorney for Missouri School Boards' Association  
121 Madison Street  
Jefferson City, MO 65101  
(573) 616-1911  
[rbrownlee@rsblobby.com](mailto:rbrownlee@rsblobby.com)

**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 20<sup>th</sup> day of April, 2017.



Richard S. Brownlee III, Attorney