

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Spire Missouri Inc's Verified )  
Application for an Accounting Authority Order ) Case No. GO-2020-0376  
Related to COVID-19 Impacts )

**APPLICATION TO INTERVENE OUT OF TIME OF  
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and respectfully submits its Application to Intervene Out of Time in this proceeding pursuant to 4 CSR 4240-2.075. In support of its Application, MIEC states as follows:

1. MIEC is a non-profit corporation that represents the interests of industrial customers in matters involving utility issues. Those interests include the interests of large industrial consumers of Spire Missouri Inc. ("Spire Missouri").

2. As a representative of the interests of large industrial customers of Spire Missouri, the MIEC's interests is different from that of the general public and may be adversely affected by actions taken as a result of the decision in this case.

3. Counsel for MIEC attempted to file a timely application on the intervention deadline of June 8, 2020. Counsel recently changed law firms, and due to changes in EFIS registration data, experienced technical difficulties submitting the document on EFIS. As a result, the application was not filed until after midnight on June 9, 2020.

3. Good cause exists to grant the MIEC's Application. Although the previous submission was out of time, it was made shortly after midnight and distributed to everyone on the service list in this case. All parties were promptly notified of the MIEC's intention to intervene, and no party will be prejudiced if this Application is granted.

4. The MIEC's intervention would serve the public interest by assisting the Commission's record for decision in this case.

5. The MIEC does not yet have a position on the issues in this case and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, MIEC respectfully requests that the Commission grant this Application to Intervene Out of Time together with any further and/or additional relief the Commission deems just and proper.

Respectfully submitted,

Curtis, Heinz, Garrett & O'Keefe, P.C.

By: /s/ Diana M. Plescia  
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Energy Consumers

**CERTIFICATE OF  
SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 16<sup>th</sup> day of June, 2020, to all parties on the Commission's service list in these cases.

/s/ Diana M. Plescia