## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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In the Matter of Spire Missouri Inc.'s d/b/a Spire Request for Authority to Implement a General Rate Increase for Natural Gas Service Provided in The Company's Missouri Service Areas.

File No. GR-2022-0179

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

COMES NOW the Missouri Industrial Energy Consumers ("MIEC") and submits its Application to Intervene in this proceeding pursuant to 20 CSR 4240-2.075 (10). 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, including companies which are large industrial consumers of Spire Missouri, Inc. d/b/a Spire.

2. All communications and pleadings in this case should be directed to:

Diana Plescia Curtis, Heinz, Garrett & O'Keefe, P.C. 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 725-8789 (Fax) dplescia@chgolaw.com

3. As a representative of the interests of large industrial customers of Spire Missouri, Inc. d/b/a Spire, the MIEC's interest 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.

4. Good cause exists to grant the MIEC's application, which was delayed due to the need for client consultation. This case is at an early stage, and no party will be prejudiced if this

application is granted. The MIEC accepts the record as it stands, including the requirements of the Commission's orders 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, the MIEC respectfully requests that the Commission grant this Application to Intervene 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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Attorney for the Missouri Industrial Energy Consumers

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this  $3^{rd}$  day of May, 2022, to all parties on the Commission's service list in this case.

/s/ Diana M. Plescia