

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

**In the Matter of Laclede Gas Company's)
Request to Increase its Revenues for) Case No. GR-2017-0215
Gas Service)**

**In the Matter of Laclede Gas Company)
d/b/a Missouri Gas Energy's)
Request to Increase its Revenues for) Case No. GR-2017-0216
Gas Service)**

MOTION TO INTERVENE OUT OF TIME

The Environmental Defense Fund (EDF), pursuant to 4 CSR 240-2.075, respectfully submits this motion to intervene as a party in this general rate case, initiated by Laclede Gas Company, also d/b/a Missouri Gas Energy (MGE) and also as Spire (Company), requesting an annual revenue requirement increase for both its Laclede Gas and Missouri Gas Energy service territories. In support of its Motion, EDF states as follows:

1. EDF is a nonprofit corporation organized under the laws of New York with a Washington DC office at 1875 Connecticut Avenue NW Washington, DC 20011; contact Natalie Karas at that office at 202-572-3389 or nkaras@edf.org. EDF is a membership organization whose mission is to preserve the natural systems on which all life depends. Guided by science and economics, EDF seeks practical solutions to resolve environmental problems. EDF uses the power of markets to speed the transition to clean energy resources, and consistent with its organizational purpose is engaged in activities to facilitate cost-effective and efficient energy market designs that encourage investment to modernize the energy grid so that it can support the ongoing deployment of renewable energy resources and energy efficiency.

2. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

Maxine L. Lipeles, MBE # 32529
Interdisciplinary Environmental Clinic
Washington University School of Law
1 Brookings Drive – CB 1120
St. Louis, MO 63130
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3. Pursuant to 4 CSR 240-2.075(10), the Commission is authorized to grant interventions filed after the intervention due date. Good cause exists to grant EDF's intervention. Due to the time necessary to obtain internal approval, EDF was unable to meet the short intervention deadline. EDF accepts the record established in this case, including the requirements of any Orders of the Commission and the parties' Amended Proposed Procedural Order dated May 16, 2017, as of the date this Motion is filed. Accordingly, no party to this matter will be adversely impacted or prejudiced by granting this Motion to Intervene.
4. On April 11, 2017, Laclede filed for a \$58.1 million rate increase. The matters to be considered in this case and the Commission's determinations thereon, could have a direct and significant impact on the cost of service to retail customers, including EDF's members. EDF's interest in this case pertains to the Company's efforts to support energy efficiency and to ensure its growth strategy, including expansion of gas distribution pipelines, ultimately benefits consumers. Therefore, granting this proposed intervention would serve the public interest and would assist the Commission in development of a more complete record. EDF's interest is direct, immediate, unique, different from that of the general public, and will not or cannot be adequately represented by any other party.

Therefore, it will aid the Commission and protect and advance the public interest that EDF be permitted to intervene in this proceeding to protect its interest.

5. EDF is unable to state its position at this time relating to the relief sought by the Company and is continuing to review Laclede's filing and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, EDF requests that the Commission grant its Motion to Intervene, entitling it to fully participate in this proceeding.

Dated: May 19, 2017

Respectfully Submitted,

/s/ Maxine Lipeles

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been served by electronic means on all parties on the Commission's most recent service list in this proceeding.

/s/ Maxine Lipeles