

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

In the Matter of Spire Missouri Inc.'s d/b/a) **Case No. GR-2021-0108**
Spire Request for Authority to Implement a General)
Rate Increase for Natural Gas Service Provided)
In the Company's Missouri Service Areas)

**SPIRE MISSOURI INC.'S RESPONSE TO THE MISSOURI GAS ASSOCIATION'S
APPLICATION TO INTERVENE OUT OF TIME**

COMES NOW Spire Missouri Inc. (hereafter "Spire Missouri" or "Spire") in response to Missouri Propane Gas Association's (hereafter "MPGA") Application to Intervene Out of Time states the following:

1. On December 23, 2020, the Missouri Public Service Commission (hereafter "Commission") issued an *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule*, (hereafter "Order") which included that applications to intervene shall be filed no later than January 12, 2021.

2. On January 25, 2021, MPGA filed its Application to Intervene Out of Time (hereafter "Application"). In its Application as support for "good cause" to late file its request MPGA asserts that propane provider members compete with investor-owned natural gas utilities for customers. As such, MPGA represents that members may be affected by Orders entered by the Commission in this proceeding, and accordingly, MPGA and those members have a direct interest in this proceeding which is different from that of the general public, and which interests cannot be adequately represented by any other party. MPGA specifically cites Spire's proposal for its Grow Missouri Program, which provides an incentive for the utility to extend gas service for rural expansion projects that otherwise would not be economically feasible, asserting that the proposed program could directly and negatively impact MPGA's member propane providers.

3. Spire objects to this Application because MPGA fails to meet the standards for intervention set forth in 20 CSR 4240-2.075 (3) in that the MPGA does not have an interest which is different from that of the general public or which may be adversely affected by a final order arising from the case, nor does its proposed intervention serve the public interest. Additionally, the request was filed out of time in violation of the Commission's Order. MPGA's attorneys routinely practice before the Commission and are aware of the orders and filing deadlines involved in rate cases. Therefore, MPGA's request should be denied by the Commission.

4. MPGA has not participated in Spire's prior rate cases for at least a decade, and its prior absence in those cases further supports Spire's position that they do not meet requirements for proper intervention in this rate case. MPGA is a not-for-profit trade association that supports local propane providers and affiliated businesses. MPGA offers a different type of service to its members and that service to its members is not regulated by the Commission, therefore MPGA's request to participate is self-serving in that it allows them to gain competitive knowledge while not having to operate under the same regulations.

5. Natural gas distribution systems operate at very high levels of service reliability. Natural gas continues to be more cost effective than other energy sources. According to the American Gas Association, annual energy costs for residential customers using natural gas has been lower than the cost for propane, fuel oil, or electricity since 2010. Spire has focused on bringing a more competitively priced and more-secure gas supply to Missouri homes and businesses by connecting to the Rockies Express Pipeline, one of the largest natural gas pipelines in America. In Missouri, homes using natural gas for heating, cooking and clothes drying save money compared to other energy sources.

6. Spire's proposed Growing Missouri Program seeks to expand natural gas service and its reliability to rural areas that often do not pass the economic feasibility criteria for the

Company to extend service. This failure to pass economic feasibility is a deterrent to industrial and commercial development in areas (mainly rural) that could benefit from this growth.¹ Eliminating the deterrent is helpful to the Missouri economy and does not jeopardize other forms of energy or interfere with free market competition as argued by MPGA.

WHEREFORE, Spire Missouri requests the Commission deny MPGA's Application to Intervene Out of Time and any other such relief the Commission deems appropriate.

Respectfully submitted,

/s/ Rachel L. Niemeier

Matthew Aplington MoBar #58565
General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
(314) 342-0785 (Office)
Email: matt.aplington@spireenergy.com

Goldie T. Bockstruck MoBar #58759
Director, Associate General Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
314-342-0533 Office
314-421-1979 Fax
Email: Goldie.Bockstruck@spireenergy.com

Rachel Lewis Niemeier MoBar #56073
Regulatory Counsel
Spire Missouri Inc.
700 Market Street, 6th Floor
St. Louis, MO 63101
314-390-2623 Office
Email: rachel.niemeier@spireenergy.com

ATTORNEYS FOR SPIRE MISSOURI INC

¹ Direct testimony, Antrainer page 5-6.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to the parties of record in this case on this 4th day of February, 2021

/s/ Rachel L. Niemeier

7. Spire's proposed Growing Missouri Program seeks to expand natural gas service and its reliability to rural areas that often do not pass the economic feasibility criteria for the Company to extend service. This failure to pass economic feasibility is a deterrent to industrial and commercial development in areas (mainly rural) that could benefit from this growth.² According to the American Gas Association, annual energy costs for residential customers using natural gas has been lower than the cost for propane, fuel oil, or electricity since 2010.

² Direct testimony, Antrainer page 5-6.

