

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

In the Matter of Spire Missouri Inc.'s d/b/a)	
Spire Request for Authority to Implement a)	File No. GR-2022-0179
General Rate Increase for Natural Gas)	
Service Provided in the Company's)	
Missouri Service Areas)	

**APPLICATION TO INTERVENE OF
CLEARWATER ENTERPRISES, LLC**

COMES NOW Clearwater Enterprises, LLC (“Clearwater”), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and this Commission's April 4, 2022 *Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, Setting a Deadline to Respond to Spire's Tariff Suspension Request, and Directing a Proposed Schedule*, and for its Application to Intervene respectfully states as follows:

1. Clearwater is a natural gas retail sales, marketing, and investment company based in Oklahoma City, Oklahoma. Clearwater provides competitively priced natural gas to its customers, advising them on the current natural gas environment and enabling them to make educated decisions in purchasing their gas supply.

2. Clearwater’s customers include end-users in Spire Missouri West's service territory (the former Missouri Gas Energy (“MGE”) service territory). Clearwater serves as a “Customer’s Agent” under the provisions of Spire’s TRPR tariffs (P.S.C. MO. No. 8 Original SHEET No. 1, et seq.) (“Spire’s Tariff”). Clearwater entered into an Agent Aggregation Service Agreement-LGS/LVS (the “Aggregation Agreement”) with MGE in 2015 to allow Clearwater to aggregate its authorizing customers’ usages for purposes of nominating and balancing transportation deliveries on the Spire system. That agreement is still in effect between Clearwater and Spire, as successor

to MGE. The Aggregation Agreement and Spire's Tariff provisions generally govern the commercial relationship between the two entities.

3. On April 1, 2022, Spire submitted direct testimony and tariff sheets to support an increase in gas revenues of approximately \$151.9 million. The tariff sheets bear an effective date of May 1, 2022. Along with the rate review, Spire is proposing extensive revisions to its gas transportation tariffs that apply to the customers served by Clearwater and other retail gas marketers ("RGM").

4. As agent for transportation customers, Clearwater's interests are different than that of the general public.

5. Clearwater reserves the right to take positions on specific issues as this case proceeds.

6. Clearwater's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

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

Stephanie S. Bell
Ellinger & Associates, LLC
308 East High Street, Suite 300
Jefferson City, MO 65101
(573)750-4100
sbell@ellingerlaw.com

WHEREFORE, Clearwater respectfully requests that the Commission issue its order granting its Application for Intervention and that it be made a party hereto with all rights to participate in this matter.

