

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

In the Matter of the Application of Summit Natural Gas )  
of Missouri Inc., for Permission and Approval and a )  
Certificate of Convenience and Necessity to Construct, )  
Install, Own, Operate, Maintain, and Otherwise Control ) File No. GA-2018-0396  
and Manage a Natural Gas Distribution System to )  
Provide Gas Service in Lawrence County as an )  
Expansion of its Existing Certificated Areas )

**SPIRE MISSOURI INC.’S MOTION TO INTERVENE**

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and, pursuant to Commission Rule 4 CSR 240-2.075, files this Motion to Intervene, respectfully stating as follows:

1. Spire Missouri is a corporation duly incorporated under the laws of the State of Missouri. The Company’s principal office is located at 700 Market Street, St. Louis, Missouri 63101. The contact information for Spire Missouri’s attorney is set forth below.

2. Spire Missouri is a gas corporation serving more than 1.1 million customers in both Eastern and Western Missouri, subject to Commission regulation. Most pertinent to this case, Spire Missouri serves over 500,000 customers in Western Missouri, formerly under the name MGE, but now known as Spire Missouri West (“Spire West”).

3. Spire West is certificated to serve the area in Lawrence County, Missouri covered by Summit’s request in its application. Moreover, Spire West is a party to the stipulation and agreement from which Summit requests a variance so it can serve the one property requested in this case. As a result, the Commission should grant this request for intervention under Commission Rule 4 CSR 240-2.075(3), because Spire Missouri has an interest that clearly differs from the general public, and that may be adversely affected by a final order in this case.

4. Spire Missouri's position in this case is complicated by the varying interests involved. On the one hand, for more than a year, Spire Missouri has supported the one customer at issue in this case obtaining gas service at the family's property, even though that service would be provided by Summit and not Spire West. Spire Missouri continues to support relief that will enable that family to obtain the benefits of natural gas service.

5. On the other hand, Spire Missouri is keenly interested in Summit's compliance with the stipulation and agreement in Case No. GA-2007-0168, an issue that has become a matter of some concern in both this matter (see Case No. GC-2017-0199) as well as earlier instances. Spire Missouri could support Summit's requested variance, subject to Summit's agreement to certain conditions that would encourage future compliance with the stipulation and agreement. Spire Missouri reserves the right to amend its position after it has had an opportunity to evaluate the testimony and recommendations presented in this case.

**WHEREFORE**, Spire Missouri respectfully requests that the Commission grant this request for intervention and permit the Company to fully participate as a party in this proceeding.

Respectfully requested,

SPIRE MISSOURI INC.

By: /s/ Rick Zucker

Rick Zucker, #49211

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**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties to this case on this 20th day of July, 2018, by hand-delivery, e-mail, fax, or United States mail, postage prepaid.

/s/ Rick Zucker