

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

In the Matter of the Application of Spire Missouri )  
Inc. d/b/a Spire, for Permission and Approval )  
and a Certificate of Convenience and Necessity )  
to Construct, Install, Own, Operate, Maintain, ) File No. GA-2021-0216  
and Otherwise Control and Manage a Natural )  
Gas Distribution System to Provide Gas Service )  
in Barry County, Missouri as an Expansion of its )  
Existing Certificated Areas. )

**APPLICATION OF SUMMIT NATURAL GAS OF MISSOURI, INC. TO INTERVENE**

**COMES NOW** Summit Natural Gas of Missouri, Inc. (“SNGMO” or the “Company”), by and through its undersigned counsel, and, pursuant to 4 CSR 240-2.075 applies to intervene in the above-captioned matter and to become a party herein. In support thereof, SNGMO respectfully states as follows to the Missouri Public Service Commission (“Commission”):

**APPLICANT**

1. The Company is a wholly owned subsidiary of Summit LDC Holdings, LLC, which is a wholly-owned subsidiary of Summit Utilities, Inc. The Company is a corporation duly incorporated under the laws of the State of Colorado, with its principal offices located at 10825 E. Geddes Avenue, Suite 410, Centennial, CO 80112.

2. The Company conducts business as a “gas corporation” and a “public utility” as those terms are defined at §386.020, RSMo, and provides natural gas service in the Missouri counties of Benton, Caldwell, Camden, Daviess, Douglas, Greene, Harrison, Howell, Laclede, Miller, Morgan, Pettis, Stone, Taney, Texas, Webster, and Wright, subject to the jurisdiction of the Commission as provided by law.

3. On January 12, 2021, Spire Missouri, Inc. (“Spire”) filed its application for a certificate of convenience and necessity authorizing it to construct, install, own, operate, maintain,

and otherwise control and manage a natural gas distribution system to provide gas service to the entirety of Barry County, Missouri. On January 13, 2021, the Commission issued its *Order Directing Notice and Establishing Time for Filings*, setting a deadline for intervention of February 12, 2021.

4. SNGMO seeks intervention because it has “Line-Only” certificated service territory in parts of Barry County, and therefore, SNGMO’s interest in this matter is different from that of the general public and cannot be represented adequately by any other party to this proceeding. SNGMO wishes to ensure that its certificate and pipeline are not impacted by Spire’s planned expansion.

5. At this time, SNGMO is unsure of the position it will take.

WHEREFORE, for the foregoing reasons, SNGMO respectfully requests, for good cause shown, that the Commission grant its Application to Intervene and allow it to become a party to this proceeding.

Respectfully submitted,

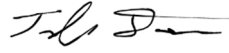
By:     /s/ Brooke South      
**Brooke South, #66624**  
Corporate Counsel  
Summit Utilities, Inc.  
116 Chiefs Court  
Branson, MO 65616  
Phone: (479) 783-3181 x2229  
E-Mail: bsouth@aogc.com

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 12<sup>th</sup> day of February, 2021:

General Counsel's Office  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office of the Public Counsel  
[opc@ded.mo.gov](mailto:opc@ded.mo.gov)

A handwritten signature in black ink, appearing to be "T. L. D.", written over a horizontal line.