

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2020 Utility Resource Filing) **File No. EO-2021-0021**
Pursuant to 20 CSR 4240 – Chapter 22)

MOTION TO INTERVENE OF SPIRE MISSOURI INC.

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”) and, pursuant to Commission Rule 20 CSR 4240-2.075, files this Motion to Intervene, and in support thereof respectfully states as follows:

1. On September 27, 2020, Union Electric Company d/b/a/ Ameren Missouri filed its 2020 Integrated Resource Plan (“IRP”), as required by the Commission’s Electric Utility Resource Planning Rule, 20 CSR 4240-22. The Commission’s deadline to file applications to intervene in this matter is October 30, 2020.

2. 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. Spire Missouri is a gas corporation and energy provider to 1.1 million customers, many of whom also receive electric service from Ameren Missouri, the applicant in this proceeding. The contact information for Spire Missouri’s attorneys is set forth below.

3. Ameren Missouri’s 2020 IRP states that “[u]ses of fossil fuel in other sectors of the economy will see the potential for electrification as well, including cooking, space heating, and industrial processes.” Discussion regarding these issues are of interest to Spire whose business is impacted by matters like electrification. As an investor-owned gas utility regulated by this Commission, whose service territory overlaps with Ameren Missouri’s, Spire Missouri has a direct interest in the issues presented in Ameren Missouri’s utility resource filing. Spire Missouri’s

intervention is in the public interest, as Spire Missouri's participation may aide the Commission in addressing the implications associated with the matters included in the utility resource filing.

4. Spire Missouri does not take a position on any specific issue at this time but may develop positions on specific issues as this case proceeds.

5. Communications, correspondence, orders and decision in this matter should be addressed to the undersigned.

WHEREFORE, Spire Missouri respectfully requests that the Commission issue its order granting intervention and permitting the Spire Missouri Inc. to intervene and participate as a party in all respects in this proceeding.

Respectfully requested,

SPIRE MISSOURI INC.

By: **/s/Goldie T. Bockstruck**
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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Motion to Intervene of Spire Missouri Inc. was served on all parties of record on this 30th day of October, 2020 by e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

/s/ Goldie T. Bockstruck _____
Goldie T. Bockstruck