

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

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

**RESPONSE TO SPIRE MISSOURI’S OBJECTION TO
MOTION TO INTERVENE OF UNIVERSITY OF MISSOURI**

The University of Missouri (“University”) responds to Spire Missouri’s (“Spire”) objection to their Motion to Intervene as follows:

1. The University is different from any other customer before the Commission in this case in that they take service under multiple tariffs (residential, small general service, large general service, transportation service, and large volume transportation service).
2. In addition to the multiple tariff classes that the University is served under, the University also has human needs customers in residential buildings and houses.
3. More importantly, in addition to the reasons previously stated, none of the entities referenced by Spire is a body corporate and politic of the State of Missouri, and as such, the University’s interests can only be sufficiently represented by its intervention in this proceeding. The University is a public, not-for-profit institution, funded predominately through state appropriation and student tuition and fees with a mission to provide all Missourians the benefits of a world-class university. The University is the custodian of public funds with a fiduciary responsibility to the taxpayers of the State of Missouri and to our students to ensure our expenditures are just and reasonable.

4. The University is unique from any other customer in this case.
5. While the University agrees with Spire that it should more closely monitor Spire's activities going forward, Spire made no argument regarding the insufficient notice delivered to the University.
6. Spire did not identify any specific harm to itself, the parties to this proceeding, or the administration of this proceeding should the University be included as a party to this case. The University committed in its request for intervention that it will comply with the requirements of 20 CSR 4240-2.075(10) and limit its participation to the record as developed, including the requirements of any orders of the Commission, as of the date the motion was filed. Rather, Spire's concern seemed focus more on future potential rulings from this Commission than the pending Motion to Intervene before this Commission.

WHEREFORE, the University prays that this Commission issue an order granting its motion to intervene in this case and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Heather H. Starnes
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th of October, 2022 a copy of the foregoing **Response to Spire Missouri's Objection to Motion to Intervene by the University of Missouri** has been served on all parties on the official service lists for this matter via filing in the Commission's EFIS system and/or email.

/s/ Heather H. Starnes

Heather H. Starnes