

**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) File No. GR-2022-0179
General Rate Increase for Natural Gas Service) Tracking No. YG-2022-0244
Provided in the Company’s Missouri)
Service Areas)

APPLICATION TO INTERVENE BY
SYMMETRY ENERGY SOLUTIONS, LLC

COMES NOW, Symmetry Energy Solutions, LLC (“Symmetry”), pursuant to Missouri Public Service Commission (“Commission”) Rule 20 CSR 4240-2.075, and files its Application to Intervene in the referenced case. In support thereof, Symmetry states as follows:

1. On April 1, 2022, Spire Missouri Inc. d/b/a Spire (“Spire”) submitted tariff sheets to produce a net increase in gas revenues of approximately \$151.9 million, and to make changes in “any rate or charge, or in any form of contract or agreement, or any rule or regulation relating to any rate, charge or service, or in any general privilege or facility,” as governed by §393.140(11) *Revised Statutes of Missouri*. The tariff sheets bear an effective date of May 1, 2022.

2. On April 4, 2022, the Commission issued its *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*, which set a deadline of April 15, 2022 for responses to Spire’s tariff suspension request, and an intervention deadline of April 25, 2022.

3. Symmetry, a natural gas marketer, sells natural gas to customers who are on Spire’s system pursuant to Spire’s transportation tariff.

4. As part of its current filing, Spire proposes changes to its current tariff that would, *inter alia*, (1) require telemetry for many of Symmetry's customers which will result in additional costs for many customers and perhaps be unaffordable for many small businesses; (2) permit Spire total discretion to solely determine an "acceptable" delivery point for each of Symmetry's customers; (3) require unnecessarily onerous and expensive credit documentation; (4) require Symmetry to submit to this Commission's jurisdiction and supervision; (5) permit Spire to immediately suspend or revoke Symmetry's right to provide service under Spire's tariff; (6) shorten the deadlines for Symmetry's and its customers' nominations; (7) increase some charges to Symmetry and its customers; (8) permit Spire to physically disconnect the flow of gas to Symmetry's customers; (9) permit Spire to provide less than 24 hours' notice of an OFO or POC of undetermined duration; (10) deny this Commission's Due Process procedures to Symmetry and its customers by requiring full payment of all disputed penalties as a condition precedent to seeking this Commission's review of Spire's calculation and imposition of penalties; (11) require undefined 24 hour on-call "technical staff;" and (12) immediately cause Symmetry to lose at least 200 of its current customers.

5. The revised thresholds and requirements proposed by Spire will limit the ability of marketers such as Symmetry to offer customers natural gas alternatives to Spire and will invariably and greatly increase natural gas costs for Missouri customers.

6. As detailed in Paragraph 4 above, Symmetry's and its customers' interests in the changes Spire proposes in its tariff are both significant and different from those of the general public. Additionally, Symmetry's and its customers' interests may be adversely affected by a final order from this Commission in this case. Symmetry wishes to ensure that both its and its customers' interest in affordable and reliable natural gas are preserved for the future, that Symmetry and its customers have the ability to appropriately plan for the future, and that

Symmetry and its customers are not disadvantaged – economically or otherwise – by Spire’s current proposed tariff changes. Symmetry’s and its customers’ interests are not currently represented by any other party to this case, nor are they likely to be.

7. Symmetry’s initial response to certain of Spire’s proposed tariff changes is not supportive, but Symmetry expects to develop its position on the issues that affect it and its customers as the case develops, and thus Symmetry takes no final position on Spire’s proposed changes at this time.

8. Granting intervention to Symmetry would serve the public interest by allowing Symmetry to examine the issues that are significant to it and its customers from a unique policy and public interest perspective.

9. Correspondence, communications, orders and the decision in this matter should be addressed to the undersigned counsel for Symmetry.

10. Because of the significance of the multiple issues addressed in Paragraph No. 4 above to Symmetry and its customers, Symmetry files this Application to Intervene immediately prior to its response filed in compliance with this Commission’s order that “any responses to Spire’s request to not suspend its tariff sheets an additional six months beyond August 28, 2022” be filed no later than April 15, 2022.

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

Respectfully submitted,

By: /s/ Peggy A. Whipple
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***ATTORNEYS FOR SYMMETRY
ENERGY SOLUTIONS, LLC***

Certificate of Service

I hereby certify that on this 15th day of April, 2022, a copy of the foregoing **Application to Intervene by Symmetry Energy Solutions, LLC** has been served on all parties on the official service list for this matter via filing in the Commission's EFIS system and/or email.

/s/ Peggy A. Whipple
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