

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

In the Matter of Kansas City Power & Light) **File No. EO-2019-0132**
Company’s Application for Authority to Establish a) Tariff No. JE-2019-0104
Demand-Side Programs Investment Mechanism) Tariff No. YE-2019-0103

In the Matter of KCP&L Greater Missouri Operations) **File No. EO-2019-0133**
Application for Authority to Establish a Demand-Side) Tariff No. YE-2019-0102
Programs Investment Mechanism)

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 many of the same areas in Western Missouri served by the KCP&L entities. The Company formerly provided service in western Missouri under the name MGE, but is now known as Spire Missouri West (“Spire West”).

3. Spire Missouri has a direct interest in these demand side cases, as Spire West co-delivers with the KCP&L entities two energy efficiency programs, including a Whole House program (referred to as Heating, Cooling, & Weatherization by KCP&L in MEEIA Cycle 3) and a program that benefits low-income customers living in multi-family units. In addition, as an alternative heat source, Spire Missouri is also interested in electric demand side measures.

4. As a joint deliverer of energy efficiency programs and an alternative heat source, Spire Missouri's interest clearly differs from that of the general public, and may be adversely affected by a final order in these cases. Because of the Company's unique perspective, granting intervention would serve the public interest.

5. At this time, Spire Missouri is unsure of the position it will take in these cases.

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

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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 12th day of December, 2018, by hand-delivery, e-mail, fax, or United States mail, postage prepaid.

/s/ Rick Zucker