

**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)	

**MOTION TO INTERVENE BY THE
UNIVERSITY OF MISSOURI**

The University of Missouri (“University”), pursuant to 20 CSR 4240-2.075, respectfully moves to intervene in the above-referenced case. In support thereof, the University states as follows:

1. On April 1, 2022, Spire Missouri, Inc. (“Spire”) filed to amend its tariffs. Such amendments will increase Spire’s revenue by approximately \$159 million, as well as change critical terms and conditions for customers.
2. On April 4, 2022, the Missouri Public Service Commission (“Commission”) issued its Order Directing Notice, Setting Intervention Deadline, Setting Time for Responses, and Directing Filing which set an intervention deadline of April 25, 2022.
3. The University is responsible for utilities on four (4) campuses, including two (2) campuses served by Spire.
4. On September 26, 2022 notice of this case was delivered to the correct employee of the University. Prior case notices were not delivered to the correct employees of the University charged with monitoring proceedings before this Commission.
5. Upon receiving notice of this case by the correct employee, the University immediately began to analyze the impact of Spire’s request.

6. The University's analysis indicates that Spire's request will both significantly increase costs to the University and impede its ability to provide necessary and required services.

7. The University's address for this matter is General Services Building, 1011 E. 51st Street, Room 101, Kansas City, Missouri 64110, to the attention of Energy Management.

Correspondence, communications, orders, and the decision in this matter should be addressed to:

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8. The University has an interest that is different from that of the general public, in that it represents the interest of the largest state-wide institution of higher learning, as well as the flagship university, of the state. The University is also the premier not-for-profit research institution within the state. The interest of higher education and research facilities are not currently represented in this case.

9. The University agrees to accept the record as it stands, and looks forward to participating in discovery, trial, and briefing of this matter. The University opposes Spire's tariff amendments and requests the Commission deny such amendments.

10. Granting intervention to the University would serve the public interest by allowing the University's experience and insight to be part of this case.

11. The University requests under rule 20 CSR 4240-2.015 that the University's Motion to Intervene be granted for good cause.

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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Attorney for the University of Missouri

CERTIFICATE OF SERVICE

I hereby certify that on this 12th of October, 2022 a copy of the foregoing **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