

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

In the Matter of Spire Missouri Inc.’s d/b/a Spire)
Request for Authority to Implement a General) **Tracking No. YG-2022-0244**
Rate Increase for Natural Gas Service Provided in) **File No. GR-2022-0179**
the Company’s Missouri Service Areas.)

APPLICATION TO INTERVENE
OF WOODRIVER ENERGY, LLC OUT OF
TIME

COMES NOW the WoodRiver Energy, LLC (“WoodRiver”), by and through counsel, and applies to the Public Service Commission of the State of Missouri (“Commission”) for intervention after out of time in the above-captioned case pursuant to Commission Rule 20 CSR 4240-2.075, in general, and Commission Rule 20 CSR 4240-2.075(10), specifically with regard to the application being submitted out of time. In support of its application, WoodRiver states and alleges as follows:

1. On April 1, 2022, Spire Missouri Inc. (“Spire”) filed to increase its rates in the above-captioned docket and make certain tariff changes, including for Spire transportation customers like those served by WoodRiver. On April 4, 2022, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before April 25, 2022. This application is therefore made after the intervention date.

2. WoodRiver is a privately-owned natural gas marketing company serving commercial and industrial natural gas customers in Missouri and neighboring states. WoodRiver provides reliable natural gas service to commercial and industrial customers in Missouri. WoodRiver serves customers in Missouri that are served off the Spire jurisdictional gas utility system and anticipates expanding its business to serve additional customers in Missouri on Spire.

3. As a supplier on Spire, WoodRiver anticipates that its' customers will experience increased costs as a result of the rate increases proposed by Spire in this proceeding and that its customers may face potentially more onerous terms of service.

4. The matters to be considered in this case and the Commission's determinations thereon will have a direct and significant impact on the WoodRiver and its customers.

5. The interests of WoodRiver and its' customers with respect to Spire are unique and WoodRiver's interest in this proceeding is not adequately represented by any other party.

6. WoodRiver's intervention in the matter may be important to the other parties and may assist the Commission in any deliberations on the subject matter. Its intervention is in the public interest.

7. WoodRiver is uncertain of the exact position(s) it will take in this matter at this time, however based on its' initial review WoodRiver may oppose the rate increase and certain tariff changes.

8. WoodRiver will accept the record established in this case, including the requirements established by orders of the Commission.

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

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¹ Mr. Goldberg is listed as counsel subject to Commission action on his Motion for Admission Pro Hac Vice, which is being filed simultaneously herewith.

Don Krattenmaker
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WHEREFORE, for the foregoing reasons, WoodRiver, respectfully requests that the Commission grant its Application to Intervene Out of Time, entitling it to fully participate in this proceeding.

By: /s/ Jeff Austin
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Counsel to WoodRiver

Executed on May 4, 2022.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand- delivered to all parties listed on the official service list on this 4th day of May, 2022.

Respectfully submitted,

/s/ Alex Goldberg
Alex Goldberg