



MISSOURI SCHOOL BOARDS ASSOCIATION

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August 11, 2000

FILED²

AUG 11 2000

Missouri Public
Service Commission

Mr. Dale Roberts
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: Utilicorp United Inc. d/b/a Missouri Public Service – Case No. GT-2001-61

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of the Application of the Missouri Purchasing Resource Center – Energy Consortium to Intervene in Support of Tariffs. Please stamp the enclosed extra copy “filed” and return same to me.

Thank you very much for your attention to this matter.

Sincerely,

MISSOURI PURCHASING RESOURCE
CENTER – ENERGY CONSORTIUM

By:

Melissa Randol
Melissa K. Randol *by dk*

MKR/bb
Enclosures

Cc: Office of the Public Counsel

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

FILED

AUG 11 2000

Missouri Public
Service Commission

In the Matter of Missouri Public Service,)
a Division of UtiliCorp United Inc.'s)
Tariffs Designed to Establish an)
Experimental Small Volume Aggregation)
Program in Missouri.)

Case No. GT-2001-61

**APPLICATION OF THE MISSOURI PURCHASING RESOURCE CENTER-
ENERGY CONSORTIUM
TO INTERVENE IN SUPPORT OF TARIFFS**

Comes now Missouri Purchasing Resource Center - Energy Consortium ("MOPRC-EC"), in accordance with Commission Rule 4 CSR 240-2.075, and, as its application to intervene in support of tariffs, states to the Missouri Public Service Commission ("Commission") as follows:

1. MOPRC-EC is an energy purchasing group for members of the Missouri School Boards Association ("MSBA") and the Cooperating School Districts of St. Louis ("CSD"). The MSBA is made up of public school districts from all areas of the State of Missouri.¹ The CSD is made up of school districts in the metropolitan St. Louis area.²

2. Most MOPRC-EC member school districts have several buildings, which individually consume relatively small volumes of natural gas, but collectively use significant amounts of energy. Unlike a large consumer with natural gas consumption through one meter, most school facilities with equal or larger aggregate consumption do not currently have a viable option of choosing a supplier under a utility transportation tariff. Few school districts have energy experts on staff to manage natural gas purchasing. Nor do they individually have the size to fully benefit from economies of scale. MOPRC-EC's mission is to lower energy cost for all consortium members through choice

¹ A list of the MSBA's members is marked Appendix 1 and attached hereto.

² A list of the CSD's members is marked Appendix 2 and attached hereto.

of a reliable, competitive supplier and through economies of joint administration. Every dollar saved on natural gas is an extra dollar that can be spent on students, instructional programs, facility improvements, staff development or new technology.

3. As an organization of school districts, MOPRC-EC's interest in this case is different than that of the general public. Granting MOPRC-EC's proposed intervention would serve the public interest by assisting the development of a more complete record for decision by the Commission.

4. MOPRC-EC has been fortunate to have had the opportunity to work closely with MPS and the Commission Staff ("Staff") in the development of several aspects of the proposed experimental small volume aggregation program.

5. MOPRC-EC believes effective ways can be developed to provide small consumers with a viable choice of suppliers under a small volume transportation program. One such way is to experiment with an aggregation transport service program. Schools in Kansas, Illinois, Iowa and Wisconsin have successful energy aggregation programs. The proposed MPS tariffs are similar to those UtiliCorp small volume aggregation tariffs in Kansas and Iowa.

6. MOPRC-EC is ideally suited to participate in the MPS pilot program. Its members are in the business of public education and will share pilot results, thereby benefitting all small consumers, natural gas marketers, utilities and regulators in developing a universally available small volume transport program. Member institutions provide broad experience by being geographically dispersed across the MPS service area and across the interstate pipelines and various operating and market zones. The program would also generally provide experience on the matters of pricing and assignment of pipeline capacity for potential future tariff revisions.

7. The start of the school calendar is just around the corner and the winter heating season

starts shortly thereafter. Early approval is critical to allow time for the enrollment of participants and arrangements for initial deliveries of natural gas under the experimental program. Thus, MOPRC-EC requests that the Commission approve the experimental small volume aggregation program tariffs with an effective date of September 1, 2000.

WHEREFORE, MOPRC-EC requests a Commission order:

- a) granting MOPRC's application to intervene and making it a party to this case for all purposes;
- b) approving MPS's tariffs designed to establish an experimental small volume aggregation program with a September 1, 2000 effective date; and,
- c) granting such further relief as may be necessary which is consistent with the relief requested herein.

Respectfully submitted,



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ATTORNEY FOR MISSOURI PURCHASING
RESOURCE CENTER - ENERGY CONSORTIUM

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 11th day of August, 2000, to all parties of record.

Melissa Randalby
dc

MISSOURI SCHOOL BOARDS' ASSOCIATION MEMBER DISTRICTS

	Company	Dist. Enroll
03	Adair Co. R-I	337
03	Adair Co. R-II	267
05	Adrian R-III	718
13	Advance R-IV	526
07	Afton 101	2657
01	Albany R-III	567
11	Alton R-IV	732
09	Appleton City R-II	508
12	Arcadia Valley R-II	1265
10	Ash Grove R-IV	818
09	Aurora R-VIII	1972
01	Avenue City R-IX	136
09	Avilla R-XIII	161
10	Bakersfield R-IV	339
07	Bayless	1396
13	Bell City R-II	271
04	Belton 124	4596
10	Billings R-IV	450
12	Bismarck R-V	694
13	Bloomfield R-XIV	792
10	Blue Eye R-V	693
04	Blue Springs R-IV	12471
10	Bolivar R-I	2192
06	Boncl R-X	58
06	Boone Co. R-IV	1111
06	Boonville R-I	1505
05	Bosworth R-V	150
06	Bowling Green R-I	1579
10	Bradleyville R-I	205
10	Branson R-IV	2800
07	Brentwood	927
02	Brookfield R-III	1280
02	Brunswick R-II	293
01	Buchanan Co. R-IV	406
02	Bucklin R-II	220
11	Bunker R-III	313
05	Butler R-V	1065
03	Callao C-8	79
08	Camdenton R-III	3930
01	Cameron R-I	1620
13	Campbell R-II	686
03	Canton R-V	601
13	Cape Girardeau 63	4503
09	Carl Junction R-I	2484
05	Carrollton R-VII	1098
09	Carthage R-IX	3537
13	Caruthersville 18	1572

APPENDIX 1

Dist	Reg	Company	Dist	Enroll
09		Cassville R-IV		1973
04		Center 58		2714
12		Central R-III		1908
06		Centralia R-VI		1278
13		Charleston R-I		1439
05		Chilhowee R-IV		176
02		Chillicothe R-II		2122
03		Clark Co. R-I		1134
08		Clarksburg C-2		143
13		Clarkton C-4		386
07		Clayton		2405
10		Clever R-V		597
08		Climax Springs R-IV		279
05		Clinton		1942
01		Clinton Co. R-III		875
05		Cole Camp R-I		766
08		Cole Co. R-II		621
08		Cole Co. R-V		800
06		Columbia 93		15744
05		Concordia R-II		470
13		Cooter R-IV		243
11		Couch R-I		267
10		Crane R-III		682
12		Crawford Co. R-I		1038
12		Crawford Co. R-II		1477
08		Crocker R-II		595
07		Crystal City 47		624
10		Dallas Co. R-I		2180
05		Davis R-XII		64
07		De Soto 73		3120
13		Delta C-7		290
11		Dent Phelps R-III		329
13		Dexter R-XI		2198
09		Diamond R-IV		880
08		Dixon R-I		1171
11		Doniphan R-I		1622
10		Dora R-III		303
04		Drexel R-IV		384
07		Dunklin R-V		1577
01		East Buchanan Co. C-1		742
11		East Carter Co. R-II		826
04		East Lynne 40		161
09		East Newton Co. R-VI		1446
13		East Prairie R-II		1174
09		El Dorado Springs R-II		1379
08		Eldon R-I		2051
11		Eminence R-I		335

Dist	Reg	Company	Dist	Enroll
09		Everton R-III		221
04		Excelsior Springs 40		3293
09		Exeter R-VI		342
10		Fair Grove R-X		974
10		Fairview R-XI		516
12		Farmington R-VII		3689
06		Fayette R-III		738
07		Ferguson-Florissant R-II		11368
07		Festus R-VI		2462
04		Fort Osage R-I		4886
07		Fox C-6		11061
07		Francis Howell R-III		18504
12		Franklin Co. R-II		194
12		Fredericktown R-I		1928
07		Ft. Zumwalt R-II		15265
06		Fulton 58		2423
10		Gainesville R-V		786
10		Galena R-II		478
02		Gallatin R-V		593
10		Gasconade C-4		105
12		Gasconade Co. R-I		1130
12		Gasconade Co. R-II		2096
13		Gideon 37		411
05		Gilliam C-4		43
02		Gilman City R-IV		160
10		Glenwood R-VIII		258
09		Golden City R-III		309
04		Grain Valley R-V		1531
04		Grandview C-4		4357
11		Green Forest R-II		240
05		Green Ridge R-VIII		385
10		Greene Co. R-VIII		1807
09		Greenfield R-IV		571
11		Greenville R-II		896
02		Grundy Co. R-V		228
05		Hale R-I		165
10		Halfway R-III		362
02		Hamilton R-II		771
07		Hancock Place		1660
03		Hannibal 60		3778
05		Hardeman R-X		68
05		Hardin-Central C-2		194
06		Harrisburg R-VIII		579
04		Harrisonville R-IX		2387
10		Hartville R-II		794
13		Hayti R-II		992
07		Hazelwood		18425

Dist	Company	Enroll
05	Henry Co. R-I	770
10	Hermitage R-IV	377
04	Hickman Mills C-1	7311
10	Hickory Co. R-I	779
06	Higbee R-VIII	228
07	Hillsboro R-III	3595
13	Holcomb R-III	471
05	Holden R-III	1483
03	Holliday C-2	72
10	Hollister R-V	1067
11	Houston R-I	1183
10	Howell Valley R-I	246
08	Iberia R-V	742
04	Independence 30	11576
12	Iron Co. C-4	587
13	Jackson R-II	4334
01	Jefferson C-123	163
08	Jefferson City	8572
07	Jefferson Co. R-VII	744
07	Jennings	3026
05	Johnson Co. R-VII	619
09	Joplin R-VIII	7255
10	Junction Hill C-12	270
04	Kansas City 33	33825
04	Kearney R-I	2892
13	Kelso C-7	169
13	Kennett 39	2055
02	Kingston 42	55
12	Kingston K-14	898
05	Kingsville R-I	271
10	Kirbyville R-VI	294
03	Kirksville R-III	2326
07	Kirkwood R-VII	5061
05	Knob Noster R-VIII	1860
03	Knox Co. R-I	681
05	La Monte R-IV	326
10	Laclede Co. C-5	505
10	Laclede Co. R-I	839
07	Ladue	3406
05	Lafayette Co. C-1	1069
09	Lamar R-I	1311
02	Laredo R-VII	63
01	Lathrop R-II	906
05	Lawson R-XIV	1241
10	Lebanon R-III	4234
04	Lee's Summit R-VII	13900
05	Leesville R-IX	119

Dist	Rep	Company	Enroll
05		Leeton R-X	351
11		Lesterville R-IV	264
03		Lewis Co. C-1	1078
05		Lexington R-V	1174
09		Liberal R-II	556
04		Liberty 53	6276
11		Licking R-VIII	840
07		Lindbergh R-VIII	5213
02		Linn Co. R-I	285
02		Livingston Co. R-III	58
09		Lockwood R-I	420
04		Lone Jack C-6	442
06		Louisiana R-II	841
03		Luray 33	49
08		Macks Creek R-V	404
03		Macon Co. R-I	1360
03		Macon Co. R-IV	163
03		Madison C-3	276
13		Malden R-I	1205
05		Malta Bend R-V	186
10		Mansfield R-IV	769
07		Maplewood-Richmond	1115
08		Maries Co. R-I	585
08		Maries Co. R-II	911
10		Marion C. Early R-V	619
09		Marionville R-IX	685
12		Marquand-Zion R-VI	245
05		Marshall	2561
01		Maryville R-II	1401
01		Maysville R-I	743
09		McDonald Co. R-I	3436
07		Mehlville R-IX	11937
12		Meramec Valley R-III	3858
06		Mexico 59	2635
05		Miami R-I	284
05		Miami R-I Elem.	71
01		Mid-Buchanan Co. R-V	760
03		Middle Grove C-1	50
04		Midway R-I	561
02		Milan C-2	656
09		Miller R-II	680
02		Mirabile C-1	30
04		Missouri City 56	84
06		Moberly	2301
09		Monett R-I	1943
08		Moniteau Co. R-I	1324
08		Moniteau Co. R-VI	614

Dist	Region	Company	Enroll
03		Monroe City R-I	868
06		Montgomery Co. R-II	1488
08		Morgan Co. R-II	1520
10		Mountain Grove R-III	1761
09		Mt. Vernon R-V	1324
10		Mtn View-Birch Tree R-III	1337
11		Naylor R-II	385
11		Neelyville R-IV	658
13		Nell Holcomb R-IV	317
09		Neosho R-V	4039
09		Nevada R-V	2662
06		New Bloomfield R-III	590
06		New Franklin R-I	480
12		New Haven	519
13		New Madrid Co. R-I	2015
02		New York R-IV	40
08		Newburg R-II	508
10		Niangua R-V	393
10		Nixa R-II	3315
01		Nodaway-Holt R-VII	351
07		Normandy	5634
01		North Andrew Co. R-VI	364
02		North Daviess R-III	140
04		North Kansas City 74	16899
02		North Mercer Co. R-III	237
01		North Nodaway Co. R-VI	272
12		North St Francois Co. R-I	3084
11		North Wood R-IV	267
01		Northeast Nodaway Co. R-V	285
07		Northwest R-I	7723
02		Northwestern R-I	210
04		Oak Grove R-VI	1847
11		Oak Hill R-I	164
13		Oak Ridge R-VI	346
05		Odessa R-VII	2297
13		Oran R-III	407
05		Oreaville R-IV	51
11		Oregon-Howell R-III	285
05		Orrick R-XI	449
08		Osage Co. R-I	248
08		Osage Co. R-II	655
08		Osage Co. R-III	776
01		Osborn R-0	163
09		Osceola	534
10		Ozark R-VI	3348
03		Palmyra R-I	1150
03		Paris R-II	616

Dist	Company	Enroll
04	Park Hill	8647
07	Parkway C-2	20787
02	Pattonsburg R-II	206
07	Pattonville R-III	7044
13	Pemiscot Co. R-III	187
13	Perry Co. 32	2399
05	Pettis Co. R-XII	116
09	Pierce City R-VI	747
10	Plainview R-VIII	90
04	Platte Co. R-III	1891
04	Pleasant Hill R-III	1653
10	Pleasant Hope R-VI	907
02	Pleasant View R-VI	91
11	Poplar Bluff R-I	4824
13	Portageville	941
12	Potosi R-III	2449
02	Princeton R-V	428
08	Pulaski Co. R-IV	626
09	Purdy R-II	655
13	Puxico R-VIII	810
03	Ralls Co. R-II	957
04	Raymore-Peculiar R-II	3897
04	Raytown C-2	8356
10	Reeds Spring R-IV	1992
06	Renick R-V	165
10	Republic R-III	2809
03	Revere C-3	111
05	Rich Hill R-IV	508
10	Richards R-V	411
05	Richmond R-XVI	1847
12	Richwoods R-VII	216
02	Ridgeway R-V	149
11	Ripley Co. R-III	118
11	Ripley Co. R-IV	159
07	Ritenour	6492
07	Riverview Gardens	6856
07	Rockwood R-VI	20696
08	Rolla 31	4098
09	Roscoe C-1	75
11	Salem R-80	1573
01	Savannah R-III	2381
08	School of Osage R-II	1607
03	Schuyler Co. R-I	785
03	Scotland Co. R-I	705
13	Scott City R-I	1030
05	Sedalia 200	4390
13	Senath-Hornersville C-8	830

Dist	Reg	Company	Dist	Enroll
09		Seneca R-VII		1663
05		Shawnee R-III		69
03		Shelby County R-IV		872
09		Sheldon R-VIII		203
09		Shell Knob 78		225
04		Sherwood Cass R-VIII		814
13		Sikeston R-VI		4036
06		Silex R-I		337
05		Slater		484
04		Smithville R-II		1518
06		South Callaway Co. R-II		938
02		South Harrison Co. R-II		856
12		South Iron Co. R-I		400
01		South Nodaway Co. R-IV		216
13		South Pemiscot Co. R-V		798
06		Southern Boone Co. R-I		1172
13		Southland C-9		372
02		Southwest Livingston R-I		255
09		Southwest R-V		942
10		Sparta R-III		635
02		Spickard R-II		70
10		Spokane R-VII		730
12		Spring Bluff R-XV		237
10		Springfield R-XII		24884
07		St. Charles Co. R-V		1200
07		St. Charles R-VI		6370
12		St. Clair R-XIII		2423
08		St. James R-I		1783
01		St. Joseph		12210
07		St. Louis City		43900
07		St. Louis Special		6998
00		State Board of Education		0
12		Ste. Genevieve R-II		2188
12		Steelville R-III		942
05		Stet R-XV		103
01		Stewartsville C-2		305
10		Strafford R-VI		1037
04		Strasburg C-3		125
06		Sturgeon R-V		506
11		Success R-VI		118
12		Sullivan C-2		2060
07		Sunrise R-IX		345
08		Swedeborg R-III		77
05		Sweet Springs R-VII		483
11		Thayer R-II		611
05		Tina-Avalon R-II		230
02		Trenton R-IX		1269

Dist	Reg	Company	Dist	Enroll
02		Tri-County R-VII		231
06		Troy R-III		4134
11		Twin River's R-X		1135
12		Union R-XI		3084
07		University City		4417
07		Valley Park		988
12		Valley R-VI		508
11		Van Buren R-I		576
06		Van-Far R-I		676
10		Walnut Grove R-V		321
06		Warren Co. R-III		2479
05		Warrensburg R-VI		3176
05		Warsaw R-IX		1384
12		Washington		3717
08		Waynesville R-VI		4611
07		Webster Groves		4285
05		Wellington Napoleon R-IX		417
07		Wellston		630
06		Wellsville Middletown R-I		543
10		West Plains R-VII		2722
04		West Platte Co. R-II		744
12		West St. Francois R-IV		962
06		Westran R-I		729
09		Westview C-6		180
10		Wheatland R-II		296
10		Willard R-II		2997
10		Willow Springs R-IV		1315
07		Windsor C-1		3051
02		Winston R-VI		176
13		Woodland R-IV		968
06		Wright City R-II		1250

COOPERATING SCHOOL DISTRICTS

Member School Districts

St. Louis County

Affton
Bayless
Brentwood
Clayton
Ferguson-Florissant
Hancock Place
Hazelwood
Jennings
Kirkwood
Ladue
Lindbergh
Maplewood-Richmond Heights
Mehlville
Normandy
Parkway
Pattonville
Ritenour
Riverview Gardens
Rockwood
Special
University City
Valley Park
Webster Groves
Wellston

St. Charles County

Fort Zumwalt
Francis Howell
Orchard Farm
St. Charles
Wentzville

COOPERATING SCHOOL DISTRICTS

Member School Districts (Continued)

Jefferson County

Crystal City
Desoto
Dunklin R-5
Festus R-6
Fox C-6
Hillsboro
Jefferson R-7
Northwest R-1
Windsor C-1

Franklin County

Lonedell
Meramec Valley
New Haven
St. Clair
Sullivan
Union
Washington

Lincoln County

Elsberry
Troy

Gasconade County

Gasconade R-2

City of St. Louis

St. Louis City Public Schools