

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

**In the Matter of the Request of)
Liberty Utilities (Midstates Natural Gas) Corp.)
d/b/a Liberty to Implement a General Rate)
Increase for Natural Gas Service in the Missouri)
Service Areas of the Company.)**

Case No. GR-2024-0106

**MISSOURI SCHOOL BOARDS' ASSOCIATION
APPLICATION TO INTERVENE**

Comes Now the Missouri School Boards' Association ("MSBA"), by and through counsel, and pursuant to 20 CSR 4240-2.075, files its Application to Intervene in the above referenced matter. In support, the MSBA states the following:

1. MSBA is a 501(c)(6) not-for-profit corporation representing approximately 390 school districts in the State of Missouri as a trade association, several of which are subject to Liberty Utilities (Midstates Natural Gas) Corp. d/b/a Liberty's ("Liberty") natural gas tariff rates.

2. MSBA has organized a purchasing cooperative denominated MOPRC (Missouri Purchasing Resource Center); also known as the MSBA Natural Gas Consortium, which is the authorized purchasing agent for over 2,100 utility accounts which purchase natural gas on the open market which is delivered to the various schools and school districts in Missouri under the statutory School Transportation Program ("STP"). There are currently school districts on the Liberty system and most have multiple Liberty gas accounts that participate in MOPRC's STP purchasing group.

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

Terry M. Jarrett
Healy Law Offices, LLC
306 Monroe St.
Jefferson City, MO 65101
Phone: (573) 415-8379
Facsimile: (417) 864-7018

Email: terry@healylawoffices.com

4. On February 13, 2024, the Commission issued its Order Giving Notice, Setting a Deadline to Intervene, Setting a Deadline to Respond to the Test Year, and Directing a Proposed Schedule. The Order set a deadline of March 6, 2024, to intervene.

5. MSBA seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075. Under 4 CSR 240-2.075(10) the Commission is authorized to grant this Application to Intervene after the March 6, 2024, intervention date, “upon a showing of good cause.”

6. Apparently, MSBA received notice of the case filing, but due to internal issues the notice was not delivered to the appropriate person until after the intervention deadline. This situation is being remedied for any future notices.

7. MSBA further states that it is an interested, if not necessary, party to this proceeding as it is the largest STP association in the Liberty service area and will be affected by tariff alterations incidental to this case, in particular as related to gas transportation to the schools.

8. Missouri Section 393.310 RSMo., clearly recognizes the direct involvement of schools in matters before the Commission dealing with gas corporations as relating to public school tariff filings, gas purchasing, gas resale, gas metering, and gas aggregation.

9. In addition, the Commission and parties will recognize this proceeding contains tariff provisions dealing with natural gas transportation service for schools which must comply with Missouri Section 393.310 RSMo. As such, this case presents a unique issue related to Liberty and the MSBA schools.

10. MSBA’s interests in this filing are unique and cannot be reasonably represented by any other entity.

11. MSBA’s requested intervention would serve the public interest, including numerous schools and school districts.

12. MSBA has been granted intervenor status in previous filings by the Public Service Commission in many natural gas utility cases and has actively participated in those proceedings.

13. MSBA hereby affirmatively accepts the record established in this case, including the requirements of all orders of the Commission, as of the date this Application to Intervene is filed. Furthermore, MSBA's intervention will not unduly delay or prejudice the adjudication of the rights of the current parties.

14. MSBA has contacted all counsels of record in this case, and Commission Staff and Office of Public Counsel have no opposition to the intervention. Undersigned counsel also contacted Liberty, but as of this date Liberty has not responded.

WHEREFORE, the Missouri School Boards' Association requests that it be granted intervention on the above referenced matter.

Respectfully submitted,

HEALY LAW OFFICES, LLC

/s/ Terry M. Jarrett

Terry M. Jarrett, MO Bar 45663

306 Monroe St.

Jefferson City, MO 65101

Telephone: (573) 415-8379

Facsimile: (417) 864-7018

Email: terry@healylawoffices.com

Dated: March 18, 2024

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 18th day of March, 2024.

/s/ Terry M. Jarrett

Terry M. Jarrett