

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

**In the Matter of the Application of Spire )  
Missouri, Inc. d/b/a Spire to Revise ) File No. GO-2024-0242  
Transportation Service Tariffs )**

**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 Spire of Missouri, Inc. d/b/a Spire's ("Spire") 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 Spire system and most have multiple Spire gas accounts that participate in MOPRC's STP purchasing group.

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

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4. On March 7, 2024, the Commission issued its Order Giving Notice, Setting a Deadline to Intervene, and Directing Staff to File a Recommendation. The Order set a deadline of March 12, 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 Spire 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 Spire 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.

**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*

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Dated: March 19, 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 19th day of March, 2024.

*/s/ Terry M. Jarrett*

Terry M. Jarrett