

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

In the Matter of the Amendment of the)
Commission’s Rule Regarding)
Intervention)
File No. OX-2024-0256

COMMENTS OF SPIRE MISSOURI

COMES NOW Spire Missouri (“Spire”), and for its Comments on the Missouri Public Service Commission Staff (“Staff”) draft of a proposed new rule regarding intervention, states as follows:

1. On March 22, 2024, a *Notice Opening File* was issued opening this case. On March 27, 2024, the Missouri Public Service Commission (“Commission”) issued its *Finding of Necessity and Order Directing that the Proposed Rule Amendments Be Filed for Publication*. A draft of the rule and amendments were filed with the Missouri Secretary of State’s Office the same day, and filed on the Commission’s Electronic Filing and Information System (“EFIS”).

2. On May 1, 2024, the draft rule was published in the Missouri Register with a date for submission of comments to the Commission of May 31, 2024.

3. On May 2, 2024, the Commission issued its *Notice of Rulemaking Hearing*, establishing a hearing regarding the proposed amendment of 20 CSR 4240-2.115 for June 4, 2024.

4. Spire appreciates the efforts that the Commission and its Staff have taken to amend this regulation regarding intervention. Spire is in support of the amendment to 20 CSR 4240-2.075.

5. The new language proposed by the Commission provides all parties with notice of claims, which furthers the spirit of due process required by Missouri Courts.

6. “In an administrative proceeding, due process is provided by affording parties the opportunity to be heard in a meaningful manner. The parties must have knowledge of the claims of his or her opponent, [and] have a full opportunity to be heard, and to defend, enforce and protect

his or her rights.”¹ Spire believes the proposed amendment enhances the due process rights of all parties to a proceeding.

7. The amendment that the Commission proposes to 20 CSR 4240-2.075(2)(E), which would require an intervenor to provide its reason for intervention, is a reasonable expectation that allows all parties to proceed with the knowledge of the general positions and interests that other parties represent.

8. The amendment that the Commission proposes to 20 CSR 4240-2.075(2)(F), which would require an intervenor to state its position or state why it cannot take a position, will avoid unnecessary delays from parties intervening *and then* determining their interests in a case. Moreover, the amendment also would require intervenors to state when they may assert a position, which provides all parties with critical information needed to resolve cases in a timely manner.

WHEREFORE, for the foregoing reasons, the undersigned respectfully supports the Commission and requests that it accept these comments for consideration in determining the next steps regarding the proposed rule revisions.

¹ *State ex rel. Missouri Pipeline Co. v. Missouri Public Service Com’n*, 307 S.W.3d 162, 174 (Mo.App. W.D. 2009), quoting *Weinbaum v. Chick*, 223 S.W.3d 911, 913 (Mo.App. S.D. 2007).

Respectfully submitted,

/s/ Sreenivasa Rao Dandamudi

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all individuals on the service list of record on this 31st day of May, 2024.

/s/ Julie Johnson

Julie Johnson