

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

In the Matter of the Application of Spire )  
Missouri Inc. d/b/a Spire for a Certificate of )  
Convenience and Necessity to Construct, )  
Install, Own, Operate, Maintain, and )  
Otherwise Control and Manage Natural )      File No. GA-2024-0361  
Gas Distribution Systems Throughout the )  
State of Missouri and for Approval to )  
Acquire Natural Gas Assets of Southern )  
Star Central Gas Pipeline, Inc. )

**APPLICATION TO INTERVENE**  
**OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION d/b/a**  
**MISSOURI ELECTRIC COMMISSION**

COMES NOW the Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission (“MEC”), by and through counsel, pursuant to Commission Rule 4 CSR 4240-2.075, and respectfully files its Application to Intervene in this matter. In support of this Application, MEC states as follows:

1. On June 6, 2024, Spire Missouri Inc. (“Spire”) filed an Application for a Certificate of Convenience and Necessity and Approval of Purchase of Assets, and Request for a Waiver (“CCN Application”) authorizing Spire to construct, install, own, operate, maintain and otherwise control and manage natural gas distribution systems throughout the state of Missouri and for approval to acquire natural gas assets of Southern Star Central Gas Pipeline, Inc. (“Southern Star”). On June 21, 2024, the Commission issued its Order setting a deadline of July 1, 2024, for filing Applications for Intervention.

2. MEC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to Section 393.700 *et seq.* Revised Statutes of Missouri, to construct, operate, and maintain jointly owned transmission and generation facilities for the production and transmission of electric power for its members, to purchase and sell electric power and energy, and to enter into agreements with any person for the transmission of electric power. MEC is organized on a state-wide basis to promote efficient wheeling, pooling, generation, and transmission arrangements to meet the power and energy requirements of the municipal electric utilities in the State of Missouri. MEC's membership includes seventy-two municipal entities in Missouri and four advisory members in Arkansas. Together, MEC's members serve over 500,000 electric customers, over 350,000 of which are Missourians.

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

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4. MEC is the owner or part owner of four natural gas fueled power generating facilities located in Missouri which have contracts with Spire and/or Southern Star.

5. Additionally, per pages 7-8 of the testimony of Spire's Witness Lavin filed in support of Spire's CCN Application, there is a confidential "financial transaction" between Spire and Southern Star that Lavin swears will "hold other current Spire customers harmless," but MEC cannot ascertain the accuracy of that testimony and protect its interests as a current Spire and Southern Star customer because that testimony will not be accessible to MEC until MEC's Application to Intervene is granted such that MEC can participate as a party in this case.

6. Moreover, in this case Spire seeks to enlarge its certificated area because, per page 7 of the testimony of Spire's Witness Lavin, "roughly half" of the domestic farm taps at issue lie outside Spire's current certificated area. Spire's request may be impactful to MEC because, per Exhibit 5 to Spire's CCN Application, the "generalized locations" of the domestic farm taps that are at issue in this case are near several of MEC's member municipalities.

7. MEC has an interest that is different from that of the general public in that it and its member municipalities could be directly affected by any decision of this Commission regarding the issuance of the CCN and other authorities requested by Spire. MEC has a direct and immediate interest in this proceeding that is not currently represented in this matter.

8. As set forth in Paragraphs 4-7 above, MEC does not yet have access to the information that will in time following discovery of facts and the full positions of the parties enable it to take a position in support or in opposition to Spire's CCN Application.

WHEREFORE, MEC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this case.

Dated: June 26, 2024

Respectfully submitted,

HEALY LAW OFFICES, LLC

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#### **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 26th day of June, 2024.

/s/ Peggy A. Whipple  
Peggy A. Whipple