

**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 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. )

**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. 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. 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 Spire of Missouri, Inc. d/b/a Spires ("Spire") customers.

3. 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.

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

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5. According to 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 MSBA cannot ascertain the accuracy of that testimony and protect the interests of its member school districts as current Spire customers because that testimony will not be accessible to MSBA until MSBA’s Application to Intervene is granted such that MSBA can participate as a party in this case.

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

7. As set forth in paragraphs 5-6 above, MSBA 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.

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

9. 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.

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

Respectfully submitted,

HEALY LAW OFFICES, LLC

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Dated: June 26, 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 26th day of June, 2024.

/s/ Terry M. Jarrett  
Terry M. Jarrett