

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

**In the Matter of Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Adjust Its) Case No. GR-2024-0369
Revenues for Natural Gas Service.)**

**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 of its Application, 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 Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri") 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 35 schools that participate in the MOPRC STP purchasing group on the Ameren Missouri system and most of those schools have multiple gas accounts/meters.

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

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4. On October 2, 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 provided that applications to intervene shall be filed no later than October 17, 2024.

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

6. 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.

7. 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 Ameren Missouri and the MSBA schools.

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

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

10. 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: October 9, 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 9th day of October, 2024.

/s/ Terry M. Jarrett
Terry M. Jarrett