

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc.'s d/b/a)
Spire Request for Authority to Implement a)
General Rate Increase for Natural Gas)
Service Provided in the Company's)
Missouri Service Areas.)

File No. GR-2025-0107

APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.075, and respectfully applies for intervention as a party in this natural gas rate case, initiated by Spire Missouri, Inc. (“Spire” or “Company”). In support of this application, Consumers Council states as follows:

1. Consumers Council is a nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri, and has participated in numerous cases at the Missouri Public Service Commission, including previous Laclede Gas Company and Spire rate cases.

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

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3. Consumers Council's interest in this matter relates to the rates, terms and conditions of service for the Company's residential natural gas customers, including low-income and vulnerable customers. This interest is different than the general public interest.

4. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for Company's residential gas customers. The issues in this matter have drawn our attention, and the organization would like the opportunity to conduct discovery in this matter. Until Consumers Council can verify for itself the justifications for the proposed natural gas rate changes in this case, it is opposed to Spire's Application. Consumers Council reserves the right to provide the Commission with more detailed positions in this rate case, following discovery and further review.

5. The order giving notice of this rate case notes that Spire is requesting an approximate 16% net revenue increase, but it doesn't inform the public about how the proposal would actually fall disproportionately upon residential customers. The proposed base rate increase for a residential customer in the Spire Missouri East area (using 55 CCF per month) would be \$12.76, or **18.20%**, and the proposed increase bills a residential customer in Spire Missouri West (using 55 CCF per month) would be \$16.22, or **20.90%**.¹ Furthermore, Spire's proposal for the fixed residential customer charge (from \$20.00 to \$24.00 monthly) would be a 20% increase in that unavoidable fixed fee. Consumers Council desires an opportunity to challenge these rate design proposals.

¹ Lyons Direct Testimony, p. 5.

6. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

Dated: December 4, 2024

/s/ John B. Coffman

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Attorney for the Consumers Council of Missouri

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 4th day of December 2024.

/s/ John B. Coffman
