

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

In the Matter of Spire Missouri, Inc. d/b/a)	
Spire's Request for Authority to Implement)	File No. GR-2025-0107
a General Rate Increase for Natural Gas)	Tracking No. JG-2025-0078
Service Provided in the Company's)	
Missouri Service Areas)	

**APPLICATION TO INTERVENE OF
MIDWEST ENERGY CONSUMERS GROUP**

COMES NOW, the Midwest Energy Consumers Group, (“MECG”) and pursuant to 20 CSR 4240-2.075, applies to intervene in the above case. For its Application, MECG states:

1. Midwest Energy Consumers Group (“MECG”) is an incorporated entity representing the interests of large commercial and industrial users of electricity, water, and natural gas throughout the State of Missouri including the area served by Spire.
2. On November 25, 2024, Spire Missouri, Inc. filed proposed tariff sheets to increase its annual revenues by a total of \$289.5 million, with the net increase being \$236 million as \$54 million is already being recovered through the Infrastructure System Replacement Surcharge (ISRS). The Company’s filing also appears to include proposals that would change rate design and allocation among the jurisdictions and customer classes. The matters to be considered in this case and the Commission’s determinations thereon, could have a direct and significant impact on the cost of service of the large commercial and industrial customers. MECG has a direct and immediate interest in these proceedings that is different from that of the general public. MECG’s intervention will serve the public interest by assisting the record for the Commission’s decision in this case.
3. While MECG does not at this time have sufficient information to assert a position in this case, it reserves the right to assert positions after they have had an adequate opportunity to examine the record, and any documentation of other parties filed herein. In general, MECG opposes

excessive ROE, supports cost-based allocation of any revenue requirement, and opposes unlawful and unreasonable special ratemaking accounting and mechanisms that distort the balance between the utility and its customers. In addition to positions it may take in pre-filed testimony, MECG anticipates adopting formal positions on the issues in its position statements that may be filed in this case.

4. Pleadings, notices, and other correspondence in this case should be directed to undersigned counsel.

WHEREFORE, MECG respectfully requests that the Commission issue its order granting its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully,

/s/ Tim Opitz

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ATTORNEY FOR MIDWEST
ENERGY CONSUMERS GROUP

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 13th day of December 2024:

/s/ Tim Opitz
