

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

In the Matter of Spire Missouri Inc.’s)
Application for an Accounting Authority) Case No. GU-2026-0225
Order)

RESPONSE TO APPLICATION TO INTERVENE

COMES NOW Spire Missouri Inc. (“Spire Missouri” or “Company”), by and through counsel, and submits this response to the application for intervention and motion for Spire Missouri to follow 20 CSR 4240-2.135 filed by Consumers Council of Missouri (“CCM”), stating as follows:

1. On March 6, 2026, Spire Missouri filed an Application for an Accounting Authority Order, Request for Waiver of 60-Day Notice Rule, and Motion for Expedited Treatment. Due to containing material, nonpublic information, the entire Application was marked confidential, pursuant to 20 CSR 4240-2.135(2)(A) 3 and 4, as the Application relates to marketing analysis or other market-specific information.

2. On March 9, 2026, the Missouri Public Service Commission (“Commission”) issued an order directing notice, setting deadlines for intervention, and setting the date for Staff of the Commission (“Staff”) to submit its Recommendation.

3. On March 20, 2026, CCM filed its intervention request. CCM opposed “any unjust and unreasonable relief” that Spire Missouri requested, the request for a waiver, and the request for expedited treatment, despite the intervention request recognizing that CCM had not yet reviewed the Application. CCM also requested that Spire Missouri be required to provide the confidentiality designations relied upon to mark the filing confidential.

4. Spire Missouri does not oppose CCM's application to intervene in this docket. However, the Commission should not be influenced by CCM's stated opposition to the request for an AAO, waiver of the notice rule, and expedited treatment, as CCM has not reviewed the Company's filing.

5. Spire Missouri recognizes that no cover sheet or pleading was publicly available providing the reasoning behind marking the Application confidential. Consistent with a recent application for accounting authority order in File No. GU-2025-0036, which was marked entirely confidential and not opposed by any party and accepted by the Commission, the Company included its justification under the Commission's rules for marking the Application confidential in its introductory paragraph.

6. The Company will take this opportunity to provide the specific Commission confidential designations that apply to the Application. Spire Missouri marked its Application confidential pursuant to 20 CSR 4240-2.135(2)(A) 3 and 4 as it relates to marketing analysis or other market-specific information. This Application also contains material nonpublic information, the disclosure of which is governed and restricted by Regulation FD, specifically 17 CFR Sec. 243.100.

7. CCM also noted that no motion for a protective order was filed. The Commission's rules, specifically 20 CSR 4240-2.135(2)(A) allow for a party to mark confidential information without obtaining a protective order, if such information falls within one of the Commission's specific confidential designations. As the information contained throughout the entire Application fell under the confidential designations that the Company referenced above, a protective order was unnecessary.

8. If CCM is granted intervention, 20 CSR 4240-2.135(6) allows for confidential information to be disclosed to the attorney of record for the intervening party. If an employee or third party retained by the intervening party desires to review the confidential information, under 20 CSR 4240-2.135(7), such individual must certify in writing that he or she will comply with the requirements of the Commission's Confidential Information rule.

WHEREFORE, Spire Missouri respectfully requests that the Commission accept this response and grant any other relief as is just and reasonable.

Respectfully submitted,

/s/ J. Antonio Arias

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ATTORNEYS FOR SPIRE MISSOURI INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record on this 23rd day of March, 2026.

/s/ J. Antonio Arias
