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.	)))))	Case No. **GR-2027-0075** Tracking No. JG-2027-0058

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 natural gas 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 14.86% for its Spire East service area and approximately 11.27% for its Spire West service area.[1] Furthermore, Spire's proposal for the fixed residential customer charge (from $22.00 to $30.00 monthly) would be a 36.4% increase in that unavoidable fixed fee, or $96 annually. Consumers Council desires an opportunity to challenge these rate design proposals.

[1] Order Directing Notice, et al, November 4, 2026.

6. Spire has also requested a future test year ("FTY") in this case. Consumers Council is opposed to that request, as it believes that a FTY would unreasonably raise natural gas rates for residential consumers, and thus would be detrimental to public interest.[2]

7. Consumers Council is interested in reviewing and commenting on Spire's income and energy burden based proposals for ratepayer assistance in this case.

8. Consumers Council is also opposed to Spire's proposed Usage Stabilization Mechanism ("USM"). This proposed mechanism would subject residential and small business customers to the threat of even higher, nearly automatic rate increases in the future, if other customers in those customer classes use less energy than expected. In other words, it appears that class-wide conservation would trigger recovery of the associated distribution revenue shortfall, and higher rates for everyone in that class. Such a mechanism appears divorced from causation related to the change in usage. Section 386.266.3 authorizes certain rate adjustments for usage changes due to weather, conservation, or both. Spire has not explained how its formula confines special rate recovery to those authorized causes. Consumers Council is concerned about how the USM would operate during a financial downturn in the economy generally, and desires the opportunity to provide its perspective on this issue in the rate case.

[2] § 393.150.3(1), RSMo.

9. 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: November 11, 2026

/s/ John B. Coffman

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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 this11th day of November 2026.

/s/ John B. Coffman