BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Spire Missouri Inc.'s Request)		
For Authority to Implement a General Rate)		
Increase for Natural Gas Service Provided)	Case No.	GR-202100108
In the Company's Missouri Service Areas.)		

<u>APPLICATION TO INTERVENE OF</u> LEGAL SERVICES OF EASTERN MISSOURI, INC.

COMES NOW, Legal Services of Eastern Missouri, Inc., and pursuant to 20-CSR 4240-2.075, applies to intervene in the above case. For its Application, Legal Services of Eastern Missouri, Inc. states the following:

- 1. Legal Services of Eastern Missouri, Inc. ("LSEM") is a nonprofit organization and legal aid agency dedicated to advancing justice through legal representation, education, and supportive services. LSEM's principal place of business is 4232 Forest Park Avenue, St. Louis, MO 63108.
- 2. LSEM provides high quality free civil legal assistance and equal access to justice for low-income individuals and families, seniors, and persons with disabilities in twenty-one Missouri counties. Many of the individuals and families LSEM represents struggle to pay their utility bills, are under threat of a utility disconnection, or have had their utilities disconnected for nonpayment. Ensuring that energy costs remain affordable and that essential utility services remain accessible is critical to the safety and wellbeing of LSEM's clients, because utility disconnections can cause unsafe housing conditions and may lead to eviction and homelessness.
- 3. LSEM has a unique interest in Spire's requested rate increase because of its potential impact on low-income residential consumers such as LSEM's clients. As an advocate for low-income and indigent families and individuals, and because of its efforts to encourage equitable

utility and housing policies for the benefit of its clients, LSEM's interest is different than that of the general public, and may be adversely affected by a final order arising from this case.

- 4. Granting LSEM intervention will serve the public interest by assisting the Commission's record for decision in this case, and no party will be adversely affected by such intervention.
- 5. LSEM has not yet taken a position in this case, but reserves the right to do so at hearing.
 - 6. Pleadings, notices, and other correspondence in this case should be directed to:

And to:

Paul Barrs Legal Services of Eastern Missouri, Inc. 4232 Forest Park Avenue St. Louis, MO 63108 (314) 256-8733 pabarrs@lsem.org

Victoria Dempsey Legal Services of Eastern Missouri, Inc. 4232 Forest Park Avenue St. Louis, MO 63108 (314) 256-8708 vedempsey@lsem.org

WHEREFORE, Legal Services of Eastern Missouri, Inc. respectfully requests that the Commission grant this *Application to Intervene*, along with any further relief the Commission deems proper.

Respectfully Submitted,

/s/ Victoria Dempsey
Victoria Dempsey #69696
Paul Barrs # 69523
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Attorneys for Legal Services of Eastern Missouri, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and accurate copy of the foregoing response was served on all Parties of record on this 12th day of January 2021.

/s/ Victoria Dempsey