BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's 3rd Filing to)
Implement Regulatory Changes in Furtherance) File No. EO-2018-0211
of Energy Efficiency as Allowed by MEEIA.)

MOTION OF SPIRE MISSOURI INC. TO INTERVENE

COMES NOW Spire Missouri Inc. ("Spire Missouri" or "Company") and, pursuant to Commission Rule 4 CSR 240-2.075, files this Motion to Intervene, respectfully stating as follows:

- 1. Spire Missouri is a corporation duly incorporated under the laws of the State of Missouri. The Company's principal office is located at 700 Market Street, St. Louis, Missouri 63101. The contact information for Spire Missouri's attorneys is set forth below.
- 2. Spire Missouri is a gas corporation and energy provider to 1.1 million customers, many of whom also receive electric service from Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), the applicant in this proceeding. Spire Missouri is also a co-deliverer of certain energy efficiency programs with Ameren Missouri. Given this inter-relationship between the energy services provided by Spire Missouri and Ameren Missouri, Spire Missouri has a direct and obvious interest in the nature and impact of the demand side programs being proposed by Ameren Missouri as part of its MEEIA 2019-24 Plan.
- 3. As a Missouri gas utility, Spire Missouri has an interest different from that of the general public. It is unlikely, though possible, that the Company may be adversely affected by a final order in this case. Nevertheless, because of Spire Missouri's unique perspective, the Company believes that granting its proposed intervention would serve the public interest.

4. Spire Missouri generally supports the beneficial and efficient uses of energy. However, until the Company has had an opportunity to more fully evaluate the testimony and recommendations presented in this case, it is not yet sure of its position in this case.

WHEREFORE, Spire Missouri respectfully requests that the Commission issue its order granting this motion and permitting the Company to intervene and participate as a party in all respects in this proceeding.

Respectfully requested,

SPIRE MISSOURI INC.

By: /s/ Michael C. Pendergast

Michael C. Pendergast, #31763

Of Counsel

Fischer & Dority, P.C.

Telephone: (314) 288-8723

Email: mcp2015law@icloud.com

/s/ Rick Zucker

Rick Zucker, #49211

Zucker Law LLC

Telephone: (314) 575-5557

E-mail: zuckerlaw21@gmail.com

423 (R) South Main Street St. Charles, MO 63301

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Verified Application of Spire Missouri Inc. was served on the General Counsel of the Staff of the Missouri Public Service Commission and the Office of the Public Counsel on this 18th day of June 2018 by hand-delivery, e-mail, fax, or by placing a copy of such document, postage prepaid, in the United States mail.

/s/ Marcia Spangler