# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Union	)	
Electric Company d/b/a Ameren Missouri	)	File No. ET-2018-0132
For Approval of Efficient Electrification Program	)	

## 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 an energy provider to 1.1 million customers in Missouri and a public utility subject to the promotional practices rule. Spire Missouri is interested in how beneficial and efficient uses of energy can be promoted under Ameren's electrification program. The Company seeks intervention in order to provide the perspective of a natural gas company in this case.
- 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,

#### /s/ Rick E. Zucker\_

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#### /s/ Michael C. Pendergast

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#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Motion to Intervene has been duly served upon the parties to this case by email, facsimile, United States mail, postage prepaid, or by hand delivery, on this 14th day of March, 2018.

### /s/ Marcia Spangler