

In Re: Union Electric Company’s 2014)
Utility Resource Filing Pursuant to) Case No. EO-2015-0084
4 CSR 240 – Chapter 22)

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to 4 CSR 240-2.075 of the Commission's Rules of Practice and Procedure, files its Application to Intervene, respectfully stating as follows:

2. Laclede is engaged in the business of distributing and transporting natural gas to customers in Eastern Missouri via its Laclede Gas operating unit, and in Western Missouri via its Missouri Gas Energy (MGE) operating unit. As a gas corporation Laclede is subject to the jurisdiction of the Commission.

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4. Other than cases that have been docketed at the Commission, Laclede has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates.

5. Laclede is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.

6. On October 1, 2014, Union Electric Company, d/b/a Ameren Missouri (“Ameren”) filed its 2014 Integrated Resource Plan (IRP). The IRP anticipates, among other things, an increase in the use of natural gas by Ameren, and a continuation of energy efficiency programs. Laclede is the local gas distributor for a large portion of Ameren’s electric service territory, and is as a gas utility that not only offers its own energy efficiency programs but has also teamed with Ameren to offer joint electric-gas energy efficiency programs. Laclede is interested in participating in this docket to better understand the effects of the planned expanded use of natural gas, and the opportunities to partner with Ameren in cooperative ventures that may enhance the delivery and effectiveness of energy efficiency programs for customers who use both electric and natural gas service.

7. Pursuant to Commission Rule 4 CSR 240-2.075(3), Laclede states that, as a gas corporation that serves many of Ameren’s electric customers, Laclede’s interest clearly differs from that of the general public. It is also possible that Laclede’s interests may be adversely affected by a final order herein. Finally, Laclede believes that granting intervention will serve the public interest, as Laclede hopes that a better understanding of Ameren’s plans may lead to synergies that inure to the benefit of the public.

8. Laclede takes no position on the IRP.

WHEREFORE, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission grant Laclede's Application to Intervene in this proceeding.

Respectfully submitted,

/s/ Rick Zucker

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing pleading has been duly served upon the parties to this case by hand delivery, email, fax, or United States mail, postage prepaid, on this 21st day of October, 2014.

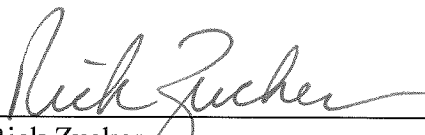
/s/ Rick Zucker

Rick Zucker


VERIFICATION

STATE OF MISSOURI)
) SS.
CITY OF ST. LOUIS)

I, Rick Zucker, being first duly sworn, verify that I am an attorney for Laclede Gas Company, that I am licensed to practice law in the State of Missouri, and that I have been authorized to file the foregoing Application to Intervene, which is true and correct to the best of my knowledge, information and belief.


Rick Zucker

Subscribed and sworn to before me this 21st day of October, 2014.


Notary Public

My Commission expires: 11.7.2015

