

LACLEDE GAS COMPANY  
720 OLIVE STREET  
ST. LOUIS, MISSOURI 63101

AREA CODE 314  
342-0532

MICHAEL C. PENDERGAST  
ASSISTANT VICE PRESIDENT  
ASSOCIATE GENERAL COUNSEL

August 31, 2001

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street  
P. O. Box 360  
Jefferson City, MO 65102-0360

FILED<sup>3</sup>

SEP 04 2001 *MTS*

Missouri Public  
Service Commission

RE: Case No. EC-2002-1

Dear Mr. Roberts:

Enclosed for filing on behalf of Laclede Gas Company, please find the original and eight copies of an Application to Intervene in the above-referenced case. Please file-stamp the additional copy of this Application and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,

*Michael C. Pendergast*  
Michael C. Pendergast

MCP:kz

cc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>

SEP 04 2001

Missouri Public  
Service Commission

Staff of the Missouri Public  
Service Commission,

Complainant,

vs.

Case No. EC-2002-1

Union Electric Company  
d/b/a AmerenUE,

Respondent.

**APPLICATION TO INTERVENE  
OF LACLEDE GAS COMPANY**

**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. In support of its Application, Laclede respectfully states as follows:

1. Laclede is a public utility incorporated under the laws of the state of Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101. Laclede is engaged in the business of distributing and transporting natural gas (and to a limited extent distributing liquefied petroleum gas) to customers in the City of St. Louis and the Counties of St. Louis, St. Charles, Crawford, Jefferson, Franklin, Iron, Ste. Genevieve, St. Francois, Madison and Butler in Eastern Missouri, as a gas corporation subject to the jurisdiction of the Missouri Public Service Commission (the "Commission"). Laclede is a Missouri corporation and a Certificate of Good Standing from the Missouri Secretary of State, which certificate was submitted as an Exhibit to Laclede's Application in Case No. GM-2001-342 and remains current and correct, is incorporated herein by reference.

2. Communications in regard to this Application should be addressed to:

R. Larry Sherwin  
Assistant Vice President-Regulatory Administration  
Laclede Gas Company  
720 Olive Street, Room 1415  
St. Louis, MO 63101  
(314) 342-0598

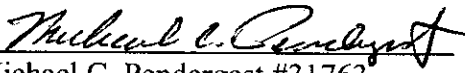
Michael C. Pendergast  
Assistant Vice President & Associate General Counsel  
Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, MO 63101  
(314) 342-0532

3. On July 2, 2001, the Staff of the Missouri Public Service Commission ("Staff") filed a complaint with the Missouri Public Service Commission against Union Electric Company, d/b/a AmerenUE ("AmerenUE") in which it alleges that Ameren UE's electric rates should be reduced. As a local natural gas distribution company that provides gas sales and other related services in competition with the services provided by AmerenUE and as a customer of AmerenUE, Laclede has a direct and obvious interest in the matters addressed by Staff's Complaint. Such interest is different from that of the general public and may be adversely affected by a final order arising from this case. Laclede would note that the Commission has consistently recognized this interest in other cases involving AmerenUE's rates. *See e.g. Re: Union Electric Company*, Case Nos. EO-96-15; EM-96-149; EO-85-17, ER-85-160, *Staff of the Missouri Public Service Commission v. Union Electric Company*, Case No. EC-87-115.

4. Until Laclede has had an opportunity to more fully evaluate the testimony and recommendations presented in this case, it is unable to take a position on the relief sought in this proceeding.


Wherefore, for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission issue its order granting Laclede's Application to Intervene and permitting Laclede to intervene and participate as a party in all respects in this proceeding.

Respectfully requested,

  
Michael C. Pendergast #31763  
Assistant Vice President and  
Associate General Counsel  
Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, MO 63101  
(314) 342-0532 Phone  
(314) 421-1979 Fax

**CERTIFICATE OF SERVICE**

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Application to Intervene of Laclede Gas Company has been duly served upon the General Counsel of the Staff of the Public Service Commission, Office of the Public Counsel and all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 31st day of August, 2001.



BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

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

I, Michael C. Pendergast, being first duly sworn verify that I: am an attorney for Laclede Gas Company ("Laclede"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing Application to Intervene; and that the foregoing is correct to the best of my knowledge, information and belief.

Michael C. Pendergast  
Michael C. Pendergast

Subscribed and sworn to before me this 31st day of August, 2001.

Joyce L. Jansen

My Commission expires: 7/2/05

JOYCE L. JANSEN  
Notary Public — Notary Seal  
STATE OF MISSOURI  
ST. CHARLES COUNTY  
My Commission Expires: July 2, 2005