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> INTERNET ADDRESS DMVUYLSTEKE@BRYANCAVE.COM

DIANA M. VUYLSTEKE

DIRECT DIAL NUMBER (314) 259-2543

April 24, 2002

Via Federal Express

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

> Case No. GA-2002-429 Re:

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are an original and eight (8) copies of the Missouri Industrial Energy Consumers' Application to Intervene.

Thank you for your assistance in bringing this filing to the attention of the Commission.

Very truly yours,

Jugisteke

Diana M. Vuylsteke

DMV:dv

cc: All parties on the Commission's service list **Enclosures**

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Laclede)	
Gas Company for an Accounting Authority)	
Order Authorizing the Company to Defer for)	
Future Recovery Consideration Its Just and)	Case No. GA-2002-429
Reasonable Costs of Providing Public Utility)	
Service that would Otherwise be Unrecovered)	
Due Solely to the Extraordinary Impact of)	
Record Warm Weather on the Company's)	
Revenues Schedules)	

APPLICATION TO INTERVENE

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch, The Boeing Company, DaimlerChrysler, Ford Motor, General Motors, Hussmann Refrigeration, Monsanto, Procter & Gamble Manufacturing, Nestle Purina PetCare, Solutia and Tyco Healthcare, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application to Intervene, the MIEC states as follows:

- The MIEC is a group of large industrial customers of Laclede Gas Company
 "Laclede" and the rates, terms and conditions of the group's natural gas service may
 be affected by the outcome of this case;
- 2. The MIEC's interest in this case is to avoid any adverse impact on the rates, terms and conditions of its natural gas service;
- As a group of large customers of Laclede, the MIEC's interest in this proceeding is different than that of the general public;
- 4. The MIEC does not yet have sufficient information to take a position regarding Laclede's filing, but reserves the right to take positions on all issues that may affect its members in this case.

5. Granting the MIEC's proposed intervention would serve the public interest by assisting the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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Quana Vuylsteke

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all counsel of record as shown on the Commission's official service list this 24th day of April, 2002.