

FILED

JUN 21 2001

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Laclede Gas)	Case No. GR-2001-629
Company's Tariff to Revise Natural)	
Gas Rate Schedules.)	Tariff No. 200101125

**VERIFIED APPLICATION OF PAPER,
ALLIED-INDUSTRIAL, CHEMICAL AND
ENERGY WORKERS LOCAL NO. 5-6, AFL-CIO, TO INTERVENE**

COMES NOW Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-6, AFL-CIO ("Local 5-6"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, Local 5-6 states:

1. This matter involves proposed tariffs submitted to this Commission by Laclede Gas Company ("Laclede"), which tariffs reflect increased rates for natural gas service provided to customers in Laclede's Missouri service area.

2. Local 5-6 is a labor organization that represents for purposes of collective bargaining approximately 1098 of Laclede's employees in "physical" classifications such as production, maintenance, operations, and distribution jobs.

3. Although Local 5-6 is, technically, an unincorporated association, labor unions are not required to register their names as fictitious names with the Missouri Secretary of State. Thus, Local 5-6 does not have evidence of any such registration.

4. The principal place of business for Local 5-6 is located at 7750 Olive Boulevard, St. Louis, Missouri 63130. The telephone number for Local 5-6 is (314) 721-

8448, and its fax number is (314) 721-8789. Local 5-6 does not have an electronic mail address.

5. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Jan Bond
Attorney at Law
Diekemper, Hammond, Shinnors,
Turcotte and Larrew, P.C.
7730 Carondelet, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
janbond@dhstl.com (E-mail)

6. Local 5-6 does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. Local 5-6 does not have any annual reports or assessment fees that are overdue.

8. Local 5-6 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representative of certain of Laclede's non-managerial, non-professional employees, Local 5-6 and the employees it represents have interests in this proceeding which are clearly different from those of the general public. Where the public's interests here are concentrated in the dependable delivery of natural gas and related products and services at a reasonable cost, Local 5-6 and the employees it represents are additionally concerned with the impact the proposed tariffs could have on jobs and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

10. Local 5-6 does not have sufficient information about the proposed tariffs to take a position at this time and thus is unsure of the position it will take in this proceeding.

11. No other party to this proceeding can adequately represent the additional, legitimate concerns of Local 5-6 and the employees it represents here.

WHEREFORE, Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO, respectfully asks the Commission to grant this application and to permit Local 5-6 to intervene here.



JAN BOND, MBN 29227
DIEKEMPER, HAMMOND, SHINNERS,
TURCOTTE AND LARREW, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
janbond@dhstl.com (E-mail)

VERIFICATION

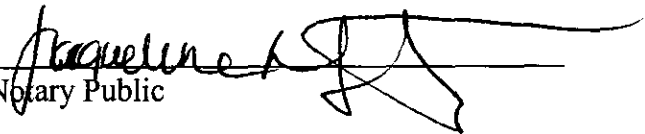
COMES NOW Jan Bond and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Bond further states that she has been authorized to sign and file this application on behalf of Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO.



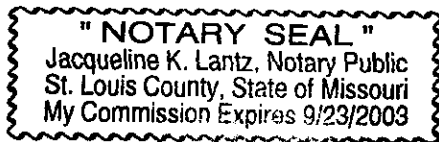
JAN BOND

Subscribed and sworn to before me this 1st day of June, 2001.

My Commission Expires:



Notary Public



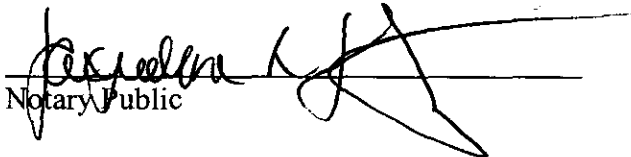
VERIFICATION OF AUTHORITY

COMES NOW Joseph Schulte and upon his oath states that he is a Business Representative of Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO; that he is authorized by Local 5-6 to make this Verification of Authority; and that Jan Bond and the other attorneys of the firm of Diekemper, Hammond, Shinnors, Turcotte and Larrew, P.C., are authorized to sign and file with the Commission this application and any other pleadings and briefs in this case that Ms. Bond and/or other attorneys in that firm deem appropriate.


JOSEPH SCHULTE

Subscribed and sworn to before me this 19th day of June, 2001.

My Commission Expires:


Notary Public

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, postage pre-paid to:

Gerald T. McNeive, Jr.
Senior Vice President - Finance and General Counsel
Laclede Gas Company
720 Olive Street
St. Louis, Missouri 63101

Douglas Micheel, Esq.
Office of the Public Counsel
Post Office Box 7800
Jefferson City, Missouri 65102

Dale Hardy Roberts, Secretary
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

Timothy Schwarz, Esq.
Missouri Public Service Commission
Post Office Box 360
Jefferson City, Missouri 65102

this 19th day of June, 2001.

