

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³
DEC 29 2000
Missouri Public
Service Commission

In the Matter of the Application of)
Laclede Gas Company for an Order)
Authorizing Its Plan to Restructure)
Itself Into a Holding Company,) Case No. GM-2001-342
Regulated Utility Company, and)
Unregulated Subsidiaries.)

**VERIFIED APPLICATION OF PAPER, ALLIED-INDUSTRIAL,
CHEMICAL, AND ENERGY WORKERS LOCAL NO. 5-6, AFL-CIO,
AND PAPER, ALLIED-INDUSTRIAL, CHEMICAL, AND
ENERGY WORKERS LOCAL NO. 5-194, AFL-CIO, TO INTERVENE**

COME NOW Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-6, AFL-CIO ("Local 5-6"), and Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-194, AFL-CIO ("Local 5-194"), by counsel, and respectfully apply 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 and Local 5-194 state:

1. This matter involves an application of Laclede Gas Company ("Laclede") for Commission authorization to perform a corporate restructuring.

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, operation, and distribution jobs. Local 5-194 is also a labor organization that represents for purposes of collective bargaining approximately 297 of Laclede's employees in clerical classifications.

3. Although both Local 5-6 and Local 5-194 are, technically, unincorporated associations, labor unions are not required to register their names as fictitious names with

the Missouri Secretary of State. Thus, Local 5-6 and Local 5-194 do not have evidence of any such registration.

4. The principal place of business for both Local 5-6 and Local 5-194 is located at 7750 Olive Boulevard, St. Louis Missouri 63130-2043. The telephone number for both Local 5-6 and Local 5-194 is (314) 721-8448, and their joint fax number is: (314) 721-8789. Neither Local 5-6 nor Local 5-194 has 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, Shinnars,
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. Neither Local 5-6 nor Local 5-194 has any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

7. Neither Local 5-6 nor Local 5-194 has any annual report or assessment fees that are overdue.

8. Local 5-6 and Local 5-194 seek permission to intervene in this matter pursuant to 4 CSR 240-2.075.

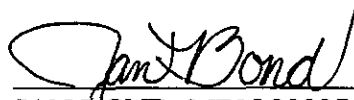
9. As the exclusive collective bargaining representatives of certain of Laclede's non-managerial, non-professional employees, Local 5-6, Local 5-194, and the employees they represent have interests in this proceeding which are clearly different from those of the general public. Where the public's interests in the proposed transaction

are concentrated in the dependable delivery of natural gas and related products and services at a reasonable cost, Local 5-6, Local 5-194, and the employees they represent are additionally concerned with the impact the proposed transaction would have on jobs, layoffs, health insurance, retirement benefits, and other terms and conditions of employment. Further, many of the unions' members have Laclede Gas Company stock interests in their §401(k) plan accounts. All of these separate interests could be adversely affected by a final order arising from the case.

10. Local 5-6 and Local 5-194 do not have sufficient information about the proposed transaction to take a position at this time and thus are unsure of the position they will take in this proceeding.

11. No other party to this proceeding can adequately represent the additional, legitimate concerns of Local 5-6, Local 5-194, and the employees they represent here.

WHEREFORE, Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO, and Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-194, AFL-CIO, respectfully ask the Commission to grant this application and to permit Local 5-6 and Local 5-194 to intervene here.



JAN BOND, MBN 29227
DIEKEMPER, HAMMOND, SHINNERS,
TURCOTTE AND LARREW, P.C.
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(314) 727-1015 (Telephone)
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janbond@dhstl.com (E-mail)

VERIFICATION


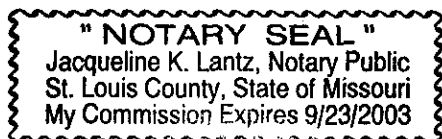
COMES NOW Jan Bond and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Bond further states 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, and Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-194, AFL-CIO.



JAN BOND

Subscribed and sworn to before me this 29th day of December, 2000.

My Commission Expires:


Notary Public

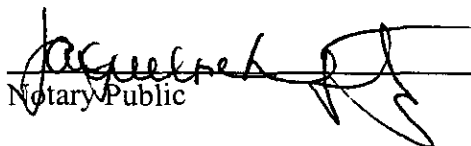
VERIFICATION OF AUTHORITY

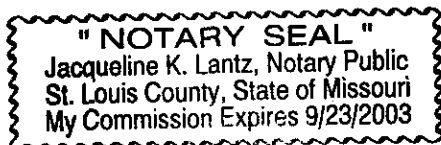
COMES NOW Joseph Schulte and upon his oath states that he is a Business Representative of Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO; that he is authorized by Local 5-6 to make this Verification of Authority; and that Jan Bond and the other attorneys of the firm of Diekemper, 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 2nd day of December, 2000.

My Commission Expires:


Notary Public



VERIFICATION OF AUTHORITY

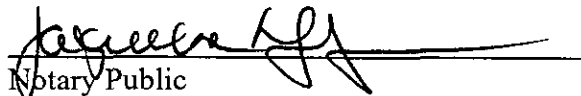
COMES NOW Barbara Temm and upon her oath states that she is President of Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-194, AFL-CIO; that she is authorized by Local 5-194 to make this Verification of Authority; and that Jan Bond and the other attorneys of the firm of Diekemper, Hammond, 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.



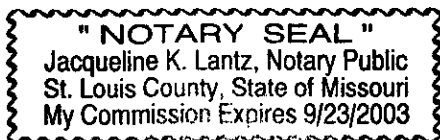
BARBARA TEMM

Subscribed and sworn to before me this 26th day of December, 2000.

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:

Douglas H. Yaeger
Chairman, President & Chief Executive Officer
Laclede Gas Company
720 Olive Street, Room 1507
St. Louis, Missouri 63101

Michael C. Pendergast, Esq.
Assistant Vice President & Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
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William J. Niehoff, Esq.
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720 West Main Street, Suite 100
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Office of the Public Counsel
301 East High Street, Box 7800
Jefferson City, Missouri 65101

Clifford Snodgrass, Esq.
Missouri Public Service Commission
Governor Office Building
200 Madison
Post Office Box 360
Jefferson City, Missouri 65102

this 28th day of December, 2000.