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IN ASSOCIATION WITH BRYAN CAVE,  
A MULTINATIONAL PARTNERSHIP.  
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February 21, 2001

**By Hand Delivery**

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65101

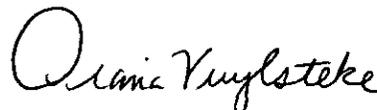
RE: Case No. GW-2001-398

Dear Judge Roberts:

Attached for filing in the above-referenced case are an original and fourteen (14) copies of the Application to Intervene of the Missouri Industrial Energy Consumers.

Thank you for your assistance in bringing this filing to the attention of the Commission. Please call me if you have any questions.

Very truly yours,



Diana M. Vuylsteke

DMV:dv

Enclosures

cc: Office of the Public Counsel  
Office of the General Counsel

**FILED<sup>2</sup>**

FEB 22 2001

Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>  
FEB 22 2001  
Missouri Public  
Service Commission

In the Matter of a Commission Inquiry Into )  
Purchased Gas Cost Recovery )  
Fixed Price Plan and Other Modifications )  
to Its Gas Supply Incentive Plan )

Case No. GW-2001-398

APPLICATION TO INTERVENE

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch, The Boeing Company, Ford Motor Company, General Motors Corporation, Hussman Refrigeration, Mallinckrodt, Inc., MEMC Electronic Materials, Monsanto Company, Procter & Gamble Manufacturing, and Ralston Purina, 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:

1. The MIEC is a group of large industrial gas consumers, and therefore has an interest in this case;
2. As large industrial gas consumers, the MIEC's interest in this proceeding is different than that of the general public;
3. The MIEC does not yet have sufficient information to take a position in this case, but reserves the right to take positions on all issues that may affect its members in this case;
4. 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.

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Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to the Office of the General Counsel and the Office of Public Counsel this 21<sup>st</sup> day of February, 2001.

*Diana Vuylsteke*