

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Office of the Public Counsel,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2016-0297
)	
Laclede Gas Company and)	
Missouri Gas Energy,)	
)	
Respondents.)	

**APPLICATION TO INTERVENE OF
THE MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Comes now the Missouri Industrial Energy Consumers (“MIEC”) and, pursuant to 4 CSR 240-2.075, and the Commission’s Calendar Notice for this case, copy attached, and, alternatively, the April 28th *Notice of Complaint, Order Establishing Time to Respond and Order Establishing Time to Apply to Intervene* files its motion to intervene. In support of its motion, the MIEC states as follows:

1. The MIEC is a Missouri corporation and its members are large industrial customers of Laclede Gas Company and Missouri Gas Energy. As such, the MIEC has an interest which is different from that of the general public and which may be adversely affected by a final order arising from this case.

2. Granting the MIEC’s motion will serve the public interest by assisting the Commission’s record for decision in this case.

3. This MIEC has not yet determined its position regarding the issues in this case, but reserves the right to take positions as this case proceeds.

4. The Commission's calendar notice, copy attached, provides that the deadline for intervention is May 31, 2016. Counsel for the MIEC was not served with a notice of the instant Complaint as is the case with rate cases. Counsel relied on the attached calendar notice prescribing a May 31 intervention deadline. They learned recently that the Judge's April 28 Order set an earlier deadline.

5. Notwithstanding the earlier intervention deadline in the Judge's order, the Commission has good cause for allowing this intervention under rule 4 CSR 240-2.075(1) because the MIEC has raised no issue that requires a response from any party, the MIEC was misinformed by a mistaken deadline on the Commission's website, the MIEC accepts the current record in this case, and no party can be prejudiced by allowing MIEC's intervention at this time.

WHEREFORE, the MIEC requests that its motion to intervene be granted and that it be made a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

By: /s/ Edward F. Downey

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Attorneys for MIEC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 31st day of May, 2016 to all parties on the Commission's service list in this case.

/s/ Edward F. Downey

Missouri Public Service Commission**Calendar - Case Specific****Date :** 5/31/2016**Case No. :** GC-2016-0297

Calendar Entries	From Date & Time	To Date	Location
Intervention Deadline	5/31/2016	5/31/2016	
Respondent to file Response to Complaint	5/31/2016	5/31/2016	