

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of )  
Missouri Gas Energy, a Division of )  
Laclede Gas Company, For Approval ) GO-2014-0179  
to Change its Infrastructure System )  
Replacement Surcharge )

APPLICATION FOR ORDER ALLOWING INTERVENTION  
OF MIDWEST GAS USERS' ASSOCIATION

Comes now MIDWEST GAS USERS' ASSOCIATION ("Midwest") and pursuant to 4 C.S.R. 240-2.075 applies to intervene herein and become a party hereto. In support thereof, Midwest respectfully states:

1. Midwest is an unincorporated non-profit association consisting of and representing its membership of business concerns and corporations that are substantial users of natural gas at their plants situated in such states as Kansas, Missouri and Oklahoma. Numerous members have plants and facilities which are located in and consume natural gas within the State of Missouri. A listing of Midwest members and participants was attached to Midwest's Application to intervene in Case No. GR-2014-0007 and is incorporated herein by reference.<sup>1/</sup>

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<sup>1/</sup>Pursuant to 4 CSR 240-2.075(3), the referenced listing includes Midwest members and companies that have at various times and in various matters participated through Midwest in proceedings in Missouri, Kansas and at the Federal Energy Regulatory Commission. The participants in a particular case will vary (continued...)

2. Midwest's interest in proceedings affecting the rates, terms and conditions of large customer natural gas service has been repeatedly recognized by the Missouri Public Service Commission in permitting Midwest's intervention in proceedings affecting The Gas Service Company, its successors, KPL Gas Service Company, Western Resources and Missouri Gas Energy, Aquila, Inc. (Missouri Public Service Company), Ameren Union Electric and in numerous generic dockets involving the terms and conditions of natural gas transportation and purchased gas adjustment clauses for natural gas companies in the State of Missouri and, most recently, Laclede Gas Company's acquisition of Missouri Gas Energy from Southern Union Corporation. Midwest's interest in proceedings affecting natural gas rates, and the terms and conditions of natural gas service also has been recognized by the Federal Power Commission and its successor the Federal Energy Regulatory Commission in granting Midwest's intervention in numerous Natural Gas Act Section 4 and 5 dockets concerning Williams Natural Gas Pipeline Company and its predecessors (now Southern Star Central), Panhandle Eastern

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<sup>1</sup>/<sub>2</sub>(...continued)  
depending on the nature of the case, the location and service area of the utility involved, and the impacts on and circumstances of a particular member's or participant's operations. Present participants who have authorized the earlier intervention are EnerSys Inc., North Kansas City Hospital, Ace ImageWear (formerly AAA Uniform Service), City of Independence Power & Light, Gilster Mary-Lee, USG Corporation, and Vance Brothers, Inc. As indicated, these parties were previously granted intervention in Commission File No. GR-2014-0007. Should other participants join, Midwest will seasonably identify these to the Commission and to any other parties through a late-filed motion to intervene.

Pipeline Company, Riverside Pipeline and other generic dockets concerning the terms and conditions of natural gas service, including FERC Orders 436, 500, 451, 528, 636 and 637. Midwest is an active participant in Commission Case No. GR-20014-0007, being MGE's pending application to increase its rates.<sup>2/</sup>

3. On or about December 6, 2013 Missouri Gas Energy, now a Division of Laclede Gas Company, (MGE) filed an application and petition for the Commission to authorize a change to MGE's present Infrastructure System Replacement Surcharge (ISRS). This surcharge is understood to appear on the billings sent to transportation customers.

4. As major customers of MGE, Midwest members and participants will be affected by the outcome of this case to a material but as yet undetermined extent.

5. Because MGE transports gas for use by Midwest members under separate transportation rate schedules and because of the size and consumption patterns of Midwest's members, Midwest is in the special position of representing interests which will not and cannot be represented adequately by any other party and which interests are direct and immediate and differ from those of the general public. Therefore, it will aid the Commission and protect the public interest that Midwest be permitted to intervene in this proceeding so as to protect

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<sup>2/</sup> Midwest expects that this file may ultimately be consolidated or presented concurrently with MGE's pending application to increase its rates, but seeks to be recognized as a party to this matter so that there is consistent participation.

interests that no other party is in a position properly to protect and adequately represent.

6. For purposes of 4 CSR 240-2.075(2), Midwest has historically opposed discriminatory, non-cost-based pricing of natural gas distribution services for all customers. Midwest is unable to make a more specific formulation or statement of the positions it will take in the issues in this case pending further review of MGE's filing, expected discovery and the positions that may be taken by other expected parties to this proceeding.

WHEREFORE, Midwest prays: (a) that Midwest be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in

argument, should any be had; and (b) for all other needful and proper relief.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR MIDWEST GAS USERS'  
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein.



Stuart W. Conrad

Dated: December 30, 2013

APPENDIX A

A D Mohr Farms	Fox Run Apartments
Ag Processing Inc a coopera- tive	Friskies Petcare Div. of Nestle' Inc.
ABB Power T & D Corporation	Frito Lay
Ace ImageWear	Folger's Coffee Co.
Alameda Plaza Inc. [Fairmont]	Gaines Foods
Alameda Towers	General Mills
American Bakeries Co.	Gilster Mary-Lee
American Beauty Macaroni	Griffin Wheel
Archer Daniels Midland Company	Guardian Management Inc.
Ark City Packing Co.	Gulf & Western Mfg.
Banquet Foods Corporation	Guys Foods Inc.
Baptist Medical Center	Hallmark Cards
Bayer Inc.	Hamm Asphalt Inc.
Bethany Hospital	Harvest Brand Inc.
Blueside Company	Hercules, Inc.
BMA	Hills Pet Food Division
Bowen Construction Co.	Hills Division of Riviana
Butler Manufacturing Co.	Hospital Linen Service
Cargill Inc.	Hudson Foods, Inc.
Carnation Can Co.	Hudson Farms
Castlegate Ind. Inc.	Hudson Food Protein
Certain-Teed Products Inc.	ICI Explosives USA, Inc.
Chesebrough-Ponds, Inc.	J C Nichols Co.
City of Osborne	Kansas City Terminal Railway
City of Holton	Koppers Co. Inc.
City of Minneapolis	Krause Milling Co.
City of Independence, Missouri	Lafarge Corporation
City of Palmyra	Lawrence Paper Company
City of Ottawa	Leggett & Platt Inc.
City of Beloit	M F A Milling
City of Baldwin	M K T Railroad
City of Ossawatomie	Hoeschst Marion Roussel
City of Sabetha	[Quintiles]
City of Horton	Maytag Corporation
City of Lincoln	McNally Pittsburg
City of Augusta	Medical Center of Independence
Coleman Alfalfa	Menorah Medical Center
Colgate Palmolive	Mid America Dairymen
Continental Baking Company	Midwest Conveyor
Cook Paint & Varnish	Midwest Grain Products
Corn Products Company	Milnot Compay
Danisco Cultor, Inc.	Mission Clay Products
Doanes Products	Missouri Steel Castings
Empire Cold Storage	Missouri Plating Co.
Energys, Inc.	Modine Manufacturing Company
Fairbanks Morse Pump	National Starch Company
Fairbanks Morse & Co.	National ByProducts
Fairmont C. C. Dairy	North Kansas City Hospital
Fasco Products, Inc.	O'Sullivan Industries
Faultless Laundry	Owens Corning Fiberglas
Ford Motor Co.	PCS Nitrogen Co.

Pet Milk Co.  
Philadelphia Quartz Co.  
Pittsburgh Corning Corporation  
Proctor & Gamble Co.  
Potash Corporation  
Quaker Oats  
Ralston Purina Co.  
Reichhold Chemical Inc.  
Research Hospital and Medical  
Center  
Reynolds Metals Co.  
Rival Manufacturing Co.  
Safeway Stores  
Santa Fe Railroad  
Sealright Mfg. Co.  
Sears Roebuck & Co.  
Seitz Foods Inc.  
Southwest Oil & Grease  
Sperry Vickers  
St. John's Hospital  
St. Joseph Light & Power  
St. Joseph's Center  
St. Francis Hospital  
St. Mary's Hospital, St. Jo-  
seph, Missouri  
St. Joseph's Hospital  
St. Lukes Hospital  
Standard Refining  
Steffen Dairy  
Swift and Company  
Swift Ind. Packing Co.  
Teva Pharmaceuticals, Inc.  
Thomas J. Lipton Inc.  
Thompson Industries  
ThyssenKrupp Stahl Co.  
Tower Metal Products  
Town of Carrolton  
TransWorld Airlines [American  
Airlines]  
Trigen - Kansas City District  
Trinity Lutheran Hospital  
Trumbull Asphalt  
U S Gypsum Co.  
Vance Brothers Asphalt  
W R Grace & Co.  
W S Dickey Clay Products Co.  
Wells Aluminum Inc.  
Winchester Foods Inc.  
Wire Rope Corporation of Amer-  
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