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

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In the Matter of the Verified Application and Petition of Laclede Gas Company to Change its Infrastructure System Replacement Surcharge

Case No. GO-2013-0352

## APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now Anheuser-Busch, The Boeing Company, Enbridge, General Motors, Hussmann Refrigeration, Mallinkrodt, MEMC Electronic Materials, Monsanto, and Nestlé Purina, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC") and pursuant to 4 CSR 240-2.075, and the Commission's January 15, 2013 *Order Suspending Tariff, Directing Notice and Setting Intervention Date*, files its Application to Intervene. In support of its Application, the MIEC states as follows:

- 1. The MIEC is a group of large customers of Laclede Gas Company ("Laclede"), and the rates, terms and conditions of the MIEC's natural gas service will be affected by the outcome of this case.
- 2. The MIEC's interest in this case is to ensure just and reasonable natural gas rates and reliable natural gas service.
- 3. As a group of large industrial customers of Laclede, the MIEC's interest in this proceeding is different than that of the general public;
- 4. The MIEC does not yet have sufficient information to take a position regarding Laclede's application in this case, but reserves the right to take positions on all issues that may affect its members in this case.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 4<sup>th</sup> day of February, 2013.

/s/ Diana M. Vuylsteke\_\_\_\_\_