

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

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

APPLICATION TO INTERVENE BY THE CONSUMERS COUNCIL OF MISSOURI

COMES NOW the Consumers Council of Missouri (“Consumers Council” or “CCM”), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies for intervention as a party in this general rate complaint case initiated by the Office of the Public Counsel (“Public Counsel” or “OPC”) regarding the over-earnings of Laclede Gas Company (“Laclede”) and Missouri Gas Energy (“MGE”) (collectively, the “Respondents”). In support of this application, Consumers Council states as follows:

1. Consumers Council is a non-governmental, nonpartisan, nonprofit corporation that is dedicated to educating and empowering consumers statewide and to advocating for their interests. Consumers Council of Missouri was originally founded in 1971 as Utility Consumers Council of Missouri, and has participated in numerous cases at the Missouri Public Service Commission (“Commission”), including previous Laclede Gas rate cases.

2. Correspondence, communications, orders and the decision in this matter should be addressed to:

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

3. Consumers Council's interest in this matter relates to the rates, terms and conditions of service for the Respondents' residential natural gas customers. Hundreds of Consumers Council's members are residential natural gas customers of Laclede or MGE. This interest is different than the general public interest.

4. Consumers Council is opposed to any unjust and unreasonable revenue requirement or discriminatory rate design for Respondents' residential natural gas customers. Consumers Council reserves the right to provide the Commission with more detailed positions in this rate complaint case, following review of the testimony and supporting documentary evidence submitted in this case by the Public Counsel and by the Respondents.

5. Consumers Council believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes.

WHEREFORE, Consumers Council respectfully requests that the Commission grant its Application to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

/s/ John B. Coffman

John B. Coffman MBE #36591
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net

Attorney for Consumers Council

Dated: May 22, 2016

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties listed on the official service list on this 22nd day of May, 2016.

/s/ John B. Coffman
