

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

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

**MISSOURI DIVISION OF ENERGY'S  
MOTION TO INTERVENE**

COMES NOW the Missouri Department of Economic Development – Division of Energy<sup>1</sup> (“DE”) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Missouri Public Service Commission (“Commission”) grant intervention to DE in the above-styled matter. For its Motion to Intervene, DE states as follows:

1. On April 27, 2016, the Office of the Public Counsel (“OPC”) filed a complaint with the Commission against Laclede Gas Company (“Laclede”) and Missouri Gas Energy (“MGE”).

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<sup>1</sup> On August 28, 2013, Executive Order 13-03 transferred “all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development . . . ”

2. The complaint alleges that Laclede and MGE's rates, which were approved by the Commission in cases GR-2013-0171 and GR-2014-0007 respectively, are excessive and should be reduced.

3. On April 28, 2016, the Commission issued its *Notice of Complaint, Order Establishing Time To Respond and Order Establishing Time To Apply To Intervene*. In its Order the Commission established an intervention deadline no later than May 20, 2016.

4. DE is a state agency vested with the powers and duties set forth in, *inter alia*, §§ 640.150 and 640.676 RSMo.

5. DE was an intervening party and signatory to the stipulation and agreements which established Laclede's and MGE's current rates.

6. DE's interests are different than those of the general public, as illustrated by its statutory authority to plan for future energy needs and energy resource development; develop, promote, administer and monitor energy conservation programs;<sup>2</sup> consult and cooperate with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; and analyze the potential for increased use of energy alternatives and make recommendations for the expanded use of such alternate energy sources and technologies.<sup>3</sup> DE's intervention, moreover, will serve a public interest, as DE will evaluate the filings from a formal state policy and planning perspective consistent with its interests in clean, affordable, abundant energy, and its efficient use.

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<sup>2</sup> §§ 640.676 and 640.150.2 RSMo.

<sup>3</sup> § 640.150.1 RSMo.

7. DE expects to develop its positions on specific issues as this case proceeds.
8. Communications, correspondence, orders, and decision in this matter should be addressed to the undersigned with a copy to [DEDEnergyCases@ded.mo.gov](mailto:DEDEnergyCases@ded.mo.gov)

WHEREFORE, the Missouri Department of Economic Development – Division of Energy respectfully requests that it be allowed to intervene in this case.

Respectfully submitted,

/s/ Alexander Antal

Alexander Antal  
Associate General Counsel  
Missouri Bar No. 65487  
Department of Economic Development  
P.O. Box 1157  
Jefferson City, MO 65102  
Phone: 573-522-3304  
Fax: 573-526-7700  
alexander.antal@ded.mo.gov  
**Attorney for Missouri Division of Energy**

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 19<sup>th</sup> day of May, 2016.

/s/ Alexander Antal  
Alexander Antal