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April 1, 2005

Public Service Commission  
Governor State Office Bldg.  
Jefferson City, MO 65102

**FILED<sup>2</sup>**  
APR 01 2005  
Missouri Public  
Service Commission


RE: In the Matter of Laclede Gas Company, Case No. GR-2005-0284

Dear Sir/Madam:

Enclosed for filing please find an original and 9 copies of Missouri Department of Natural Resources' Application to Intervene Filed Out of Time in the above-styled matter. Please stamp "filed" on the extra copy for my files. Thank you.

Sincerely,

JEREMIAH W. (JAY) NIXON  
Attorney General

  
SHELLEY A. WOODS  
Assistant Attorney General

SAW:pah  
Enclosure  
c: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

APR 01 2005

Missouri Public  
Service Commission

In the Matter of Laclede Gas Company )

)

Case No. GR-2005-0284

**MISSOURI DEPARTMENT OF NATURAL RESOURCES' APPLICATION  
TO INTERVENE FILED OUT OF TIME**

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant it application to intervene in the above-styled matter. This application is made for the following reasons:

1. On February 18, 2005, Laclede Gas Company (Laclede) filed with the Missouri Public Service Commission (PSC) proposed tariff sheets to implement a general rate increase for natural gas service.
2. On February 28, 2005, the PSC issued a Suspension Order and Notice in the above-styled case ordering, among other things, that interested parties should file applications to intervene on or before March 15, 2005.
3. The Missouri Department of Natural Resources (MDNR), and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
4. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the

proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. In particular, the Energy Center will look at the proposed filing to assess the commitment by the Company to provide low or no cost weatherization to low income families and the provision of energy efficiency programs. The Energy Center's review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

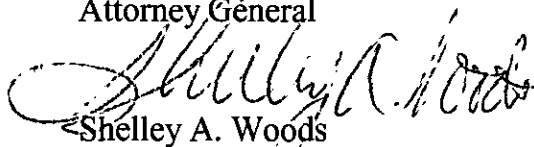
5. Although this application is after the deadline for filing applications to intervene, the February 28, 2005, Suspension Order provided interested parties approximately two weeks in which to file applications. While late, this application is filed before the parties have proceeded very far along in this case.

6. The Energy Center takes no position on the case as filed, but would welcome the opportunity to work with the Company, Staff and OPC to explore whether

the Company is interested in developing a program that has meaningful benefits to consumers and the environment.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,  
JEREMIAH W. (JAY) NIXON  
Attorney General

A handwritten signature in cursive script, appearing to read "Shelley A. Woods", is written over the printed name.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 1<sup>st</sup> day of April, 2005:

John Coffman  
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