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March 14, 2005

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#### **BY HAND DELIVERY**

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Governor Office Building 200 Madison Street Jefferson City, Missouri 65101 FILED<sup>4</sup> MAR 1 4 2005

# Missouri Public Service Commission

Re: Case No. GR-2005-0284

Dear Mr. Roberts:

Attached for filing in the above-referenced case are an original and eight (8) copies of the Application to Intervene of the Missouri Industrial Energy Consumers or "MIEC".

We would appreciate it if you would file-stamp the extra copy for our records. Thank you for your assistance in bringing this filing to the attention of the Commission, and please call me if you have any questions.

Very truly yours,

Jiana Vingleteke

Diana M. Vuylsteke DMV:rms

## Bryan Cave LLP One Metropolitan Square 211 North Broadway Suite 3600 St. Louis, MO 63102-2750 Tel (314) 259-2000 Fax (314) 259-2020 www.bryancave.com

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And Bryan Cave, A Multinational Partnership, London

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

#### Misseuri Public Service Commission

MAR 1 4 2005

In the Matter of Laclede Gas Company's ) Tariff to Revise Natural Gas Rate Schedules )

Case No. GR-2005-0284

### APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now Anheuser-Busch Companies, Inc., The Boeing Company, DaimlerChrysler, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, J.W. Aluminum, Monsanto Company, Pfizer, Precoat Metals, Procter & Gamble Manufacturing, Nestlé Purina and Solutia, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application, the MIEC states as follows:

- 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 may be affected by the outcome of this case;
- 2. The MIEC's interest in this case is to ensure that Laclede provides natural gas service to the MIEC under reasonable terms and conditions at just and reasonable rates;
- 3. As a group of large 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, but reserves the right to take positions on all issues that may affect its members in this case.

5. Granting the MIEC's proposed intervention would serve the public interest by assisting in the development of a more complete record for decision by the Commission.

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

uslateke By: IDAAC Diana M. Vuylsteke, #42419

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ATTORNEY FOR THE MIEC

#### CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have served on all parties by electronic service this 14<sup>th</sup> day of March, 2005.

Diana Muylsteke