

LACLEDE GAS COMPANY
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101

AREA CODE 314
342-0532

MICHAEL C. PENDERGAST
ASSISTANT VICE PRESIDENT
ASSOCIATE GENERAL COUNSEL

May 21, 2001

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
P. O. Box 360
Jefferson City, MO 65102-0360

FILED²
MAY 22 2001
Missouri Public
Service Commission

RE: Case No. GM-2001-585


Dear Mr. Roberts:

Enclosed for filing, please find the original and eight copies of the Application to Intervene of Laclede Gas Company in the above-referenced case.

Please file-stamp the additional copy of this Application and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,


Michael C. Pendergast

MCP:kz

cc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

MAY 22 2001

Missouri Public
Service Commission

In the Matter of the Joint Application of)
Gateway Pipeline Company, Inc.,)
Missouri Gas Company and Missouri)
Pipeline Company.)
Case No. GM-2001-585

**APPLICATION TO INTERVENE
OF LACLEDE GAS COMPANY**

Comes Now Laclede Gas Company ("Laclede" or "Company") and pursuant to
4 CSR 240-2.075 of the Commission's Rules of Practice and Procedure files its
Application to Intervene. In support of its Application, Laclede respectfully states as
follows:

1. Laclede is a public utility incorporated under the laws of the state of
Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101.
A Certificate of Good Standing evidencing Laclede's corporate status in Missouri is
attached hereto, and made a part hereof, as Exhibit 1. Laclede is engaged in the business
of distributing and transporting natural gas (and to a limited extent distributing liquefied
petroleum gas) to customers in the City of St. Louis and the Counties of St. Louis,
St. Charles, Crawford, Jefferson, Franklin, Iron, Ste. Genevieve, St. Francois, Madison
and Butler in Eastern Missouri, as a gas corporation subject to the jurisdiction of the
Missouri Public Service Commission (the "Commission").

2. Communications in regard to this Application should be addressed to:

Steven F. Mathews
Assistant Vice President-Gas Supply
Laclede Gas Company
720 Olive Street, Room 1513
St. Louis, MO 63101
(314) 516-8585

Michael C. Pendergast
Assistant Vice President & Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
(314) 342-0532

3. On April 19, 2001, Gateway Pipeline Company, Inc., Missouri Gas Company and Missouri Pipeline Company (collectively, "Joint Applicants") pursuant to §393.190, RSMo 2000, 4 CSR 240-2.060(12) and 4 CSR 240-2.080(17), filed a Joint Application for Finding of Lack of Jurisdiction or, Alternatively, for Authority for Gateway to Acquire the Outstanding Shares of UtiliCorp Pipeline Systems, Inc. and Motion for Expedited Treatment. As a local natural gas distribution company that receives a significant portion of the gas transported through the facilities of Missouri Pipeline Company, an intrastate pipeline company, Laclede has a direct and obvious interest in the acquisition proposals that is different from that of the general public. Laclede's interest in proceedings involving Missouri Pipeline Company has been repeatedly recognized by the Commission in prior proceedings. See, e.g., Case Nos. GA-89-126, GA-90-280, GM-94-252 and GR-92-314. Laclede should accordingly be permitted to intervene and participate in this proceeding.

4. Until Laclede has had an opportunity to more fully evaluate Joint Applicant's proposals, it will not be able to take a position on whether to support or oppose all or certain aspects of the relief requested by Joint Applicants.

Wherefore, for the foregoing reasons, Laclede Gas Company respectfully requests that it be permitted to intervene and participate in this proceeding.

Respectfully requested,

Michael C. Pendergast
Michael C. Pendergast #31763
Assistant Vice President and Associate
General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
(314) 342-0532 Phone
(314) 421-1979

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

State of Missouri)
) SS.
County of St. Louis)

I, Michael C. Pendergast, being first duly sworn verify that I: am an attorney for Laclede Gas Company ("Laclede"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing Application to Intervene; and that the foregoing is correct to the best of my knowledge, information and belief.

Michael C. Pendergast
Michael C. Pendergast

Subscribed and sworn to before me this 21st day of May, 2001.

Patricia P. Hicks

My Commission expires: _____
PATRICIA P. HICKS
Notary Public — Notary Seal
STATE OF MISSOURI
City of St. Louis
My Commission Expires: June 27, 2002

CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Application to Intervene has been duly served upon the General Counsel of the Staff of the Public Service Commission, Office of the Public Counsel and all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery, on this 21ST day of May, 2001.

Michael C. Pendergast

No. 00042501

STATE OF MISSOURI



Rebecca McDowell Cook
Secretary of State

CORPORATION DIVISION

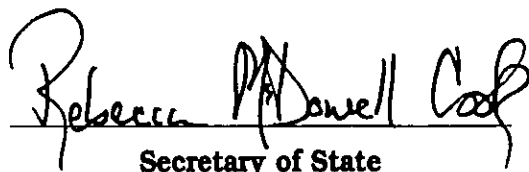
CERTIFICATE OF CORPORATE GOOD STANDING

I, REBECCA McDOWELL COOK, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

LACLEDE GAS COMPANY

was incorporated under the laws of this State on the 9th day of APRIL, 1924, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 27th day of NOVEMBER, 2000.


Secretary of State

