

FILED<sup>2</sup>

MAR 14 2005

Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

In the Matter of Laclede Gas	)	<u>Case No. GR-2005-284</u>
Company's Tariff to Revise Natural	)	
Gas Rate Schedules.	)	Tariff No. YG-2005-0653

**VERIFIED APPLICATION OF PAPER,  
ALLIED-INDUSTRIAL, CHEMICAL AND  
ENERGY WORKERS LOCAL NO. 5-6, AFL-CIO, TO INTERVENE**

COMES NOW Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-6, AFL-CIO ("Local 5-6"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, Local 5-6 states:

1. This matter involves proposed tariffs submitted to this Commission by Laclede Gas Company ("Laclede"), which tariffs reflect increased rates for natural gas service provided to customers in Laclede's Missouri service area.

2. Local 5-6 is a labor organization that represents for purposes of collective bargaining approximately 1050 of Laclede's employees in "physical" classifications such as production, maintenance, operations, and distribution jobs.

3. Although Local 5-6 is, technically, an unincorporated association, labor unions are not required to register their names as fictitious names with the Missouri Secretary of State. Thus, Local 5-6 does not have evidence of any such registration.

4. The principal place of business for Local 5-6 is located at 7750 Olive Boulevard, St. Louis, Missouri 63130. The telephone number for Local 5-6 is (314) 721-

8448, and its fax number is (314) 721-8789. Local 5-6's electronic mail address is gasworkerslocal@sbcglobal.net.

5. Though Local 5-6 is an "association," it does not seem to be the type of association to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) are directed. It does not appear to be the intent of those regulatory subsections for Local 5-6 to file a list of all of its members, and Local 5-6 hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that Local 5-6 must comply with the subsection, the required list will be tendered immediately.

6. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Julia R. Engelhardt  
Attorney at Law  
Diekemper, Hammond, Shinnars,  
Turcotte and Larrew, P.C.  
7730 Carondelet, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
jengelhardt@dhst.com (E-mail)

7. Local 5-6 does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

8. Local 5-6 does not have any annual reports or assessment fees that are overdue.

9. Local 5-6 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.


10. As the exclusive collective bargaining representative of certain of Laclede's non-managerial, non-professional employees, Local 5-6 and the employees it

represents have interests in this proceeding which are clearly different from those of the general public. Where the public's interests here are concentrated in the dependable delivery of natural gas and related products and services at a reasonable cost, Local 5-6 and the employees it represents are additionally concerned with the impact the proposed tariffs could have on jobs and other terms and conditions of employment. These separate interests could be adversely affected by a final order arising from the case.

11. Local 5-6 does not have sufficient information about the proposed tariffs to take a position at this time and thus is unsure of the position it will take in this proceeding.

12. No other party to this proceeding can adequately represent the additional, legitimate concerns of Local 5-6 and the employees it represents here.

WHEREFORE, Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO, respectfully asks the Commission to grant this application and to permit Local 5-6 to intervene here.

  
JULIA R. ENGELHARDT, MBN 45400  
DIEKEMPER, HAMMOND, SHINNERS,  
TURCOTTE AND LARREW, P.C.  
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Attorneys for Paper, Allied-Industrial  
Chemical, and Energy Workers Local  
No. 5-6, AFL-CIO

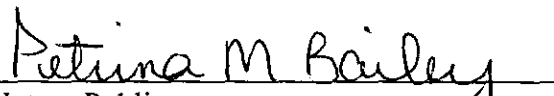
**VERIFICATION**

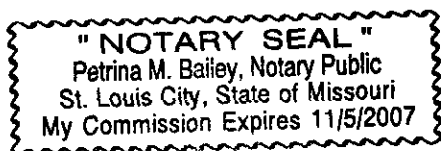
COMES NOW Julia R. Engelhardt and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Engelhardt further states that she has been authorized to sign and file this application on behalf of Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO.

  
JULIA R. ENGELHARDT

Subscribed and sworn to before me this 11 day of March, 2005.

My Commission Expires:

  
Notary Public



**Union Appendix 1**

Joseph Schulte  
7750 Olive Blvd.  
St. Louis, Missouri 63130  
(314) 721-8448 Work  
President of Local 5-6

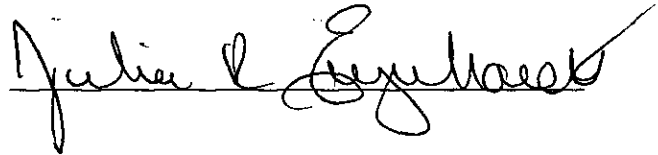
**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, this 11<sup>th</sup> day of March, 2005, postage pre-paid to:

Secretary of the  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Michael C. Pendergast  
720 Olive Street  
St. Louis, MO 63101

Office of the Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read "Michael C. Pendergast", written over a horizontal line.