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BRYAN-CAVE

April 25, 2006

BY HAND DELIVERY

Ms. Cully Dale Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Governor Office Building 200 Madison Street Jefferson City, Missouri 65101

Re: Case No. GO-2006-0377

Dear Ms. Dale:

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.

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, Diana Virylsteke

Diana M. Vuylsteke DMV:rms

cc: All Parties

Diana M. Vuylsteke Voice: 259-2543 dmvuylsteke@bryancave.com

FILED⁴

APR 2 5 2006

Missouri Public Service Commission

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Chicago Hong Kong Irvine Jefferson City Kansas City Kuwait Los Angeles New York Phoenix Riyadh Shanghai St. Louis United Arab Emirates (Dubai) Washington, DC

And Bryan Cave, A Multinational Partnership,

London

FILED⁴

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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APR 2 5 2006

Missouri Public Service Commission

In the Matter of [the Verified Application And Petition of Laclede Gas Company for Establishment of an Infrastructure System Replacement Surcharge]

Case No. GO-2006-0377 Tariff File No. YG-2006-0747

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:

- 1. 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

Jiana Vingleteke By:

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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 25th day of April, 2006.

Diana Virylstere Diana M. Vuylsteke

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