

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

JUN 20 2005

Missouri Public
Service Commission

In the Matter of the Application of Laclede)
Gas Company for a Temporary Variance) Case No. GE-2005-0405
From Certain Portions of Rule 10.A of its)
Tariff Regarding Meter Testing in)
Connection with its Implementation of)
An Automated Meter Reading Program)

**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 the application for variance submitted to this Commission by Laclede Gas Company ("Laclede"), which application seeks changes to Laclede's current meter testing requirements.

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, Shinnors,
Turcotte and Larrew, P.C.
7730 Carondelet, Suite 200
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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 variance 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,
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Attorneys for Paper, Allied-Industrial
Chemical, and Energy Workers Local
No. 5-6, AFL-CIO

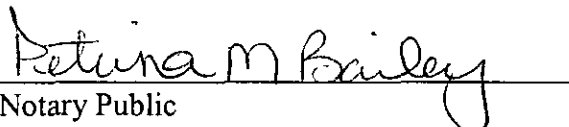
VERIFICATION

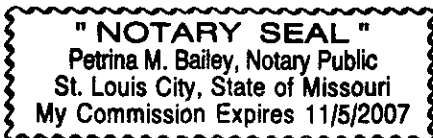
COMES NOW Julia R. Engelhardt and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Engelhardt 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 15 day of June, 2005.

My Commission Expires:


Notary Public



Union Appendix 1

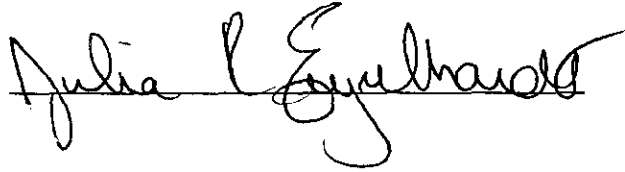
Joseph Schulte
7750 Olive Blvd.
St. Louis, Missouri 63130
(314) 721-8448 Work
President of Local 5-6

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, this 15th day of June, 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

A handwritten signature in cursive script, reading "Julia P. Egelhardt", written over a horizontal line.