

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

In the Matter of Laclede Gas Company)
Concerning a Natural Gas Incident at)
Premio Lane in Fenton, Missouri)

Case No. GS-2007-0130

MOTION TO JOIN AMERENUE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and in support of its *Motion to Join AmerenUE*, states as follows:

1. On September 26, 2006, *Staff's Request To Establish A Case For Investigation Of Gas Safety Incident* (Request) was filed to initiate the above-captioned case. Paragraph 5 of Staff's Request stated that "Staff's initial investigation indicates that a contractor for AmerenUE, also a regulated utility company, damaged a natural gas pipeline while installing an underground electric line." As a result of the damage caused by this incident, and the subsequent Commission *Order Granting Request To Open Case For Investigation Of A Natural Gas Incident* (Order) directing the Staff to conduct a formal investigation of it, the Staff has developed certain recommendations in its Report that are directed to AmerenUE for response. The Staff intends to file its Report in this matter on February 2, 2007. Accordingly, the Commission's Order further directed "Any response to Staff's report shall be filed 30 days after Staff files its report."

2. So that the Commission may receive AmerenUE's response to Staff's Report recommendations, the Staff respectfully requests the Commission join AmerenUE in this case. The Staff notes that AmerenUE has been forthcoming and helpful in its responses to Staff inquiries in this matter.

3. AmerenUE of St. Louis, Missouri is an electric corporation as defined in Section 386.020(15) RSMo 2000 and is subject to the jurisdiction of this Commission. The Commission

has statutory responsibility to assure the health and safety of employees, customers and the public service by electric corporations under Section 386.310 RSMo. Furthermore, this same section grants the Commission authority, after hearing or complaint, to issue orders to require a utility to take steps to promote the safety of utility employees, customers and the general public.

WHEREFORE, for the foregoing reasons and consistent with the Commission's Order establishing this case, the Staff prays the Commission to join AmerenUE in this case.

Respectfully submitted,

/s/ Robert S. Berlin

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record and counsel for AmerenUE this 31st day of January 2007.

/s/ Robert S. Berlin