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November 6, 2002

FILED³

NOV 06 2002

Missouri Public
Service Commission

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Public Service Commission
Governor's Office Building
Madison & E. Capitol
Jefferson City, MO 65101

RE: *In the Matter of the Tariff Filing of Laclede Gas Company to Implement a Gas Supply Incentive Plan Called Catch-Up-Keep-Up*, Case no. GT-2003-0117, Tariff No. JG-2003-396

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are the original and 14 copies of the Missouri Department of Natural Resource's Application to Intervene. Thank you for your attention to this matter.

Sincerely,

JEREMIAH W. (JAY) NIXON
Attorney General

Ronald Molteni
Assistant Attorney General

Enclosures

cc: Judge Ruth
All Parties on the Service List

FILED³

NOV 06 2002

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

**Missouri Public
Service Commission**

In the Matter of the Tariff Filing of)	
LaCledde Gas Company to Implement a)	Case No. GT-2003-0117
Gas Supply Incentive Plan called)	Tariff No. JG-2003-396
Catch-Up-Keep-Up)	

MISSOURI DEPARTMENT OF
NATURAL RESOURCES
APPLICATION TO INTERVENE

The Missouri Department of Natural Resources (MDNR), pursuant to 4 CSR 240-2.075, respectfully requests that the Commission grant its application to intervene in the above-styled matter. This application is made for the following reasons:

1. On September 23, 2002, Laclede Gas Company (the Company) submitted to the Missouri Public Service Commission (PSC) tariffs sheets to implement a program called "Catch-Up-Keep-Up."
2. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.
3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the proposed tariffs from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. In particular, the Energy Center will look at the proposed tariffs to assess the commitment by the Company to provide low or no cost weatherization to low income families. The Energy Center's review also will be in relation to the mandate set forth in Section

640.150, RSMo. The mandate set forth in the statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

4. The Energy Center opposes the proposed tariffs as filed, but would welcome the opportunity to work with the Company, Staff and OPC to explore whether the Company is interested in developing a program that has meaningful benefits to consumers and the environment.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

JEREMIAH W. (JAY) NIXON

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CERTIFICATE OF SERVICE

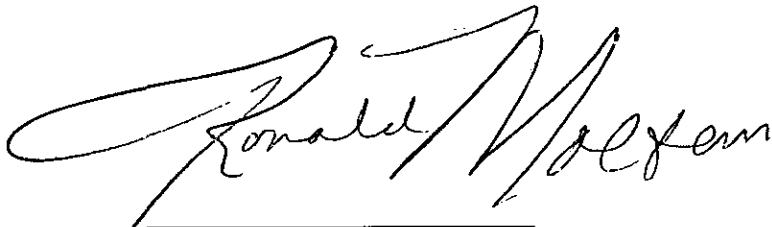
I hereby certify that a true and correct copy of the foregoing was mailed, postage prepaid,
by United States mail, this 6th day of November, 2002, to:

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