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

In the Matter of Laclede Gas Company's	)	Case No. GR-2017-0215
Request to Increase its Revenues for Gas Service	)	Tariff No. YG-2017-0195
In the Matter of Laclede Gas Company d/b/a Missouri Gas Energy's Request to Increase its Revenues for Gas Service	)	<b>Case No. GR-2017-0216</b> Tariff No. YG-2017-0196

## **APPLICATION TO INTERVENE**

COMES NOW the City of St. Joseph, Missouri, by and through counsel, and files its Application to Intervene in these cases pursuant to Section 386.420 RSMo and 4 CSR 240-2.075. In support of this application, St. Joseph states as follows:

- The City of St. Joseph, Missouri is a municipality of the State of Missouri located in Buchanan County. The principal place of business address for the City of St. Joseph is: City Hall, 1100 Frederick Avenue, St. Joseph, Missouri 64501.
- 2. All communications and pleadings in this case should be served on:

Bryan Carter
City Attorney
City Hall, Room 307
1100 Frederick Avenue
St. Joseph, MO 64501
Phone: 816-271-46

Phone: 816-271-4680 Facsimile: 816-271-4683

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and

William D. Steinmeier
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- 3. On April 20, 2017, the Commission issued its Notice of Hearing and Order Setting Conference Date, Directing Notice of Actions, Establishing Intervention Date, and Directing Filings in these cases, establishing May 1, 2017 as the deadline for applications to intervene. Thus, the instant Application to Intervene is timely.
- 4. The City of St. Joseph is a large consumer of natural gas supplied by MGE and would be affected by its proposed rates. As a municipal government, the City interacts with MGE for various purposes in public works projects and otherwise and is affected by MGE's rules and regulations. The City is also a governmental body representing the residents and commercial interests of the City. For each of these reasons, the City of St. Joseph has an interest in this matter which is different from that of the general public and which may be adversely affected by a final order arising out of this case. Granting the instant Application to Intervene would serve the public interest.
- The City of St. Joseph states that it is still reviewing the Companies' filings in this case and does not yet take a position on their proposed tariffs.

WHEREFORE, the City of St. Joseph, Missouri respectfully requests that the Missouri Public Service Commission grant this Application to Intervene and make St. Joseph a party to these proceedings.

Respectfully submitted,

## /s/ William D. Steinmeier

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COUNSEL FOR THE CITY OF ST. JOSEPH, MISSOURI

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at staffcounselservice@psc.mo.gov), on the Office of the Public Counsel (at opcservice@ded.mo.gov) and on all parties of record on this 25<sup>th</sup> day of April 2017.

/s/ William D. Steinmeier

William D. Steinmeier