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VIA HAND DELIVERY

March 29, 2004

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

FILED²

MAR 2 9 2004

Missouri Public Service Commission

Re:

Case No. GO-2004-0443

Dear Mr. Roberts:

Attached for filing in the above-referenced case is the Application to Intervene of the Missouri Industrial Energy Consumers or "MIEC".

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 M. Vuylsteke

Diana Viylsteke

DMV:rms

Enclosures (9) cc: All Parties

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And Bryan Cave, A Multinational Partnership,

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BEFORE THE PUBLIC SERVICE COMMISSION

| BEFORE THE PUBLIC SE OF THE STATE O | | FILED ² MAR 2 9 2004 |
|---|--------------------|---------------------------------|
| In the Matter of the Verified Application |) | Service Curi C |
| And Petition of Laclede Gas Company for |) | Commissic |
| Establishment of an Infrastructure System |) Case No. GO-2004 | 4-0443 |
| Replacement Surcharge |) | , |

APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now Alcoa Foil Products, Anheuser-Busch Companies, Inc., The Boeing Company, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, 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

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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 29th day of March, 2004.

Diana Wuylsteke
Diana M. Vuylsteke