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February 26, 2001

FILED

FEB 27 2001

**Missouri Public
Service Commission**

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Ste. 100
Jefferson City, MO 65102-0360

Re: Case No. GM-2001-342

Dear Mr. Roberts:

Enclosed for filing on behalf of the Missouri Energy Group are an original and seven (7) copies of its Late-Filed Application to Intervene in the above matter. I will appreciate your bringing this filing to the attention of the Commission. An additional copy of this Application is enclosed which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Thank you for your attention to this matter.

Yours very truly,



Lisa C. Langeneckert

gmw
Enclosures (10)
cc: All Counsel of Record

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

In the Matter of the Application of Laclede)
Gas Company for an Order Authorizing)
Its Plan to Restructure Itself Into a Holding)
Company, Regulated Utility Company, and)
Unregulated Subsidiaries)

Case No. GM-2001-342

FILED

FEB 27 2001

LATE-FILED APPLICATION
TO INTERVENE OF THE
MISSOURI ENERGY GROUP

Missouri Public
Service Commission

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital, DaimlerChrysler Corporation, The Doe Run Company, Emerson Electric Company, Lone Star Industries Inc., River Cement Company, SSM HealthCare, and Unity Health System (collectively known as the "Missouri Energy Group", and hereinafter referred to as "Applicants"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. Applicants own and operate not-for profit hospital systems and large industrial plants within the state of Missouri. Over a period of many years Applicants have purchased substantial amounts of gas from Laclede Gas Company and other utility companies in the state of Missouri.

2. The matters to be considered in this case and the Commission's determinations thereon, could have a direct significant impact on Applicants' cost of energy service and the manner in which it is supplied. In addition the Commission's decisions and rulings herein may establish precedent for restructuring of gas utilities in the state of Missouri and thereby affect all

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utility customers in the state of Missouri. Therefore, granting this proposed intervention to the Applicants would serve the public interest.


3. It is Applicants' position that their interests may be adversely affected by the transactions proposed herein. The Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants cannot assert a position on specific matters because they have insufficient information, they reserve the right to assert positions after they have had an adequate opportunity to examine the record, testimony and exhibits of other parties filed and to be filed herein.

4. Although various members of the Missouri Energy Group have intervened in Laclede Gas cases filed over the past twenty (20) years, it was not made aware of the existence of this case or of the Order of this Commission directing that motions to intervene be filed by January 25, 2001 until Friday, February 23, 2001. The Missouri Energy Group has acted as expeditiously as possible to request intervention after learning of the existence of this case. Further, the Missouri Energy Group respectfully suggests that granting its intervention at this time would not hinder or delay the progress of this case and that no other party would be prejudiced by permitting the Missouri Energy Group to intervene in this case at this time.

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant this Application for Intervention, and thereby entitle said Applicants to have notice and to appear at the taking of

testimony, to produce and cross-examine witnesses, and to be heard in person or by counsel on the argument, and in all other respects to be made parties to this proceeding.

Respectfully Submitted,



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Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

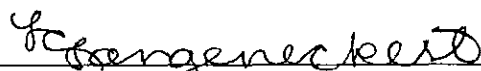
Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. GM-2001-309

Dated at St. Louis, Missouri this 26th day of February, 2001:

Michael C. Pendergast, Esq.
Assistant General Counsel
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