

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

In the Matter of Veolia Energy Kansas City, Inc.     )  
For Authority to File Tariffs to Increase Rates.     )     Case No. HR-2014-0066

**MGE’s APPLICATION TO INTERVENE**

COMES NOW Laclede Gas Company, Missouri Gas Energy division (“MGE”) pursuant to 4 CSR 240-2.075, and for its application to intervene in the above-captioned proceeding, respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. On November 27, 2013, Veolia Energy Kansas City, Inc. (“Veolia”) submitted to the Commission proposed tariff sheets intended to implement a general rate increase.

2. By the Commission’s Order Suspending Tariff, Scheduling Pre-Hearing Conference, Directing Notice, and Setting Deadline for Intervenors issued December 3, 2013, the Commission directed interested parties to file motions for intervention by December 24, 2013. MGE hereby requests such intervention.

3. Laclede Gas Company is duly incorporated under the laws of the State of Missouri with its principal office located at 720 Olive Street, St. Louis, Missouri 63101. A Certificate of Good Standing evidencing Laclede’s standing to do business in Missouri was submitted in Case No. GM-2013-0254 and is incorporated herein by reference for all purposes. The information in such Certificate is current and correct. Laclede Gas Company conducts business in its western Missouri service territory through its Missouri Gas Energy division under the fictitious name of Missouri Gas Energy. A copy of a certificate from the Missouri Secretary of State that Missouri Gas Energy is a registered fictitious name of Laclede Gas Company was submitted in Case No. GO-2014-0179 and is incorporated herein by reference.

4. Other than cases that have been docketed at the Commission, Laclede Gas Company does not have a pending action or final unsatisfied judgment against it from any state or federal agency or court within the past three (3) years that involve customer service or rates. Laclede has no annual report or assessment fees that are overdue.

5. The MGE division of Laclede Gas Company provides natural gas service to approximately 500,000 customers in the western Missouri counties of Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Pettis, Platte, Ray, Saline, Stone, and Vernon.

6. MGE is subject to the jurisdiction of the Missouri Public Service Commission as provided by law.

7. Communications in regard to this Application should be addressed to the undersigned counsel and:

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8. MGE should be allowed to intervene in this proceeding because it has an interest that is different from that of the "general public" that may be adversely affected by a final order in this case and because granting intervention to MGE would serve the public

interest. As a provider of natural gas service in a territory which substantially overlaps the territory in which Veolia provides service, Laclede Gas Company, through its Missouri Gas Energy division, competes with Veolia for business opportunities. Consequently, MGE has an interest in this proceeding related to issues including, but not limited to, the areas of class cost-of-service, rate design, service territory expansion, safety issues, rates, and rules of service. MGE's status as a Missouri public utility and MGE's direct specific interests in the subjects of this proceeding indicate that its intervention would serve the public interest.

9. MGE has not yet had an opportunity to review Veolia's filing in detail and, as such, cannot yet state precisely what its position is in this proceeding. Upon further review of Veolia's filing, updates, and discovery responses, MGE will be able to state its position in this matter. A detailed statement of position and identification of issues with respect to Veolia's proposals may be submitted by MGE in accordance with the procedural schedule.

**WHEREFORE**, for the reasons stated herein, Laclede Gas Company, through its Missouri Gas Energy division, respectfully requests that the Commission issue an order permitting it to intervene in this case with full rights as a party hereto.

Respectfully submitted,

/s/

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/s/

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 23<sup>rd</sup> day of December, 2013, to counsel of record.

*/s/*

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Todd J. Jacobs