

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

Office of the Public Counsel,)	
)	
Complainant,)	
)	
v.)	File No. GC-2016-0297
)	
Laclede Gas Company and)	
Missouri Gas Energy)	
)	
Respondents.)	

**APPLICATION TO INTERVENE
OF THE MIDWEST ENERGY CONSUMERS' GROUP**

COMES NOW the Midwest Energy Consumers' Group ("Applicants" or "MECG"), pursuant to 4 C.S.R. 240-2.075 and the Commission's April 28, 2016 *Notice of Complaint, Order Establishing Time to Respond and Order Establishing Time to Apply to Intervene*, and for its Application to Intervene respectfully states as follows:

1. MECG is an unincorporated association of large natural gas transportation customers. Relevant to the immediate proceeding, MECG consists of large transportation customers of Laclede Gas Company or Missouri Gas Energy. Specifically, for purposes of this case, MECG consists of: SSM Health Care Corporation, a Missouri nonprofit corporation, d/b/a SSM Health, on behalf of itself and its subsidiary entities; Ameristar Casino St. Charles, LLC; PNK (River City), LLC; Schnuck Markets, Inc.; Maritz Holdings, Inc.; EaglePicher Technologies, LLC; Jasper Products, L.L.C.; Enersys Energy Products, Inc.; Tyson Foods, Inc.; Orbital ATK, Inc.; North Kansas City Hospital; Little Blue Valley Sewer District; Veolia Energy Veolia Energy Kansas City, Inc., Trigen-St. Louis Energy Corporation; and Ameristar Casino

Kansas City, LLC. MECG recognizes the possibility of adding members in the near future and will notify the Commission at such time as those members are added.

2. The matters to be considered in this case and the Commission's determinations thereon could have a direct and significant impact on Applicants' cost of natural gas transportation services. Therefore, granting this proposed intervention to the Applicants would serve the public interest and would assist the Commission in development of a more complete record.

3. As large transportation customers of Laclede Gas Company or Missouri Gas Energy, the Applicants have a direct and immediate interest in these proceedings that is different from that of the general public. While Applicants do not, at this time, have sufficient information to assert a position on this investigation, they reserve the right to assert positions after they have had an adequate opportunity to examine the record and any documentation of other parties filed herein.

4. Correspondence and communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

David L. Woodsmall
Woodsmall Law Office
308 East High Street, Suite 204
Jefferson City, MO 65101

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 of 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,

WOODSMALL LAW OFFICE

/s/ David Woodsmall

David L. Woodsmall Mo. Bar #40747

308 E. High Street, Suite 204

Jefferson City, Missouri 65101

(573) 797-0005

Facsimile (573) 635-7523

david.woodsmall@woodsmalllaw.com

ATTORNEY FOR THE MIDWEST ENERGY
CONSUMERS' GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing pleading has been served by electronic means on all parties of record as reflected in the records maintained by the Secretary of the Commission through the EFIS system.

/s/ David Woodsmall

David Woodsmall

Dated: May 17, 2016