

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

In the Matter of Laclede Gas Company's)
Request to Increase its Revenues for) **Case No. GR-2017-0215**
Gas Service)

APPLICATION TO INTERVENE

COMES NOW the Midwest Energy Consumers' Group ("MECG"), pursuant to 4 CSR 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, and for its Application to Intervene respectfully states as follows:

1. The Midwest Energy Consumers Group is an incorporated association representing the interests of large commercial and industrial users of electricity and natural gas throughout the State of Missouri including in the area served by Laclede Gas Company.

2. Correspondence or 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 E. High Street, Suite 204
Jefferson City, MO 65101
Voice: (573) 797-0005
Fax: (573) 636-6007
E-mail: david.woodsmall@woodsmalllaw.com

3. On April 11, 2017, Laclede filed for a \$58.1 million rate increase. The matters to be considered in this case and the Commission's determinations thereon, could have a direct and significant impact on cost of service to large commercial, industrial and transportation customers. 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. MECG's interest is direct, immediate, unique, different from that of the general public, and will

not or cannot be adequately represented by any other party. Therefore, it will aid the Commission and protect and advance the public interest that MECG be permitted to intervene in this proceeding to protect its interest.

4. For purposes of 4 CSR 240-2.075(2), MECG states that it is opposed to discriminatory pricing of gas and related utility services, is opposed to increases that are not reasonable and are not related to prudent costs that are incurred by the utility in providing utility service, and is opposed to a utility being permitted to earn what may be an unreasonably high rate of return. MECG is unable to state its position relating to the relief sought by Laclede and is continuing to review Laclede's filing and reserves the right to take positions on specific issues as this case proceeds.

WHEREFORE, MECG prays: (a) that it be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings, to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief appropriate in the premises.

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) 636-6007
david.woodsmall@woodsmalllaw.com

ATTORNEY FOR THE MIDWEST ENERGY
CONSUMERS' GROUP

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that 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: April 17, 2017