

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Laclede Gas Company's
Tariff to Revise Natural Gas Rate Schedules

)
)
) Case No. GR-2010-0171

**APPLICATION TO INTERVENE
OF THE MISSOURI ENERGY GROUP**

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital and SSM HealthCare (collectively known as the "Missouri Energy Group" and hereinafter referred to as "Applicants" or "MEG"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

1. The MEG is an ad hoc group that includes not-for-profit hospital systems located within the state of Missouri that have purchased substantial amounts of gas from Laclede Gas Company ("Laclede") and have actively participated in previous cases involving Laclede before this Commission;
2. As large-use customers, the rates and terms and conditions of the water service of Applicants may be substantially and uniquely affected by the outcome of this case. MEG's interests in this matter cannot be adequately represented by any other party.
3. It is the position of these Applicants that revenue requirements should be determined on the basis of total cost of service and that rates for each class should be determined using an appropriate classification and allocation of those costs. Parties traditionally involved in gas cases have differing views on the appropriate level of costs, the treatment of costs, their causative factors, the cost allocation methodology to be used, and the intra-class rate design. It is

only with a reasoned analysis of all parties' methods that all of the parties' interests can be adequately represented.

4. Applicants do not yet have sufficient information to take a position regarding specific issues raised and to be raised in Laclede's application and evidence in this case but reserve the right to take positions on all issues that may affect applicants.

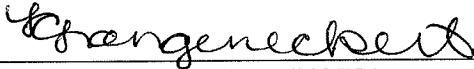
5. Granting intervention by Applicants in this case will serve the public interest by assisting the Commission in developing a more complete record for its decision; and

6. Correspondence or communications regarding this application, including service of all notices and orders of this Commission shall be addressed to:

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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 to Intervene and thereby entitle said Applicants to participate fully in this proceeding.

SANDBERG PHOENIX & von GONTARD P.C.

By: 


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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. GR-2010-0171.

Dated at St. Louis, Missouri this 28th day of December, 2009



Lisa C. Langeneckert