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IN ASSOCIATION WITH BRYAN CAVE,
A MULTINATIONAL PARTNERSHIP.
LONDON, ENGLAND

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April 24, 2002

Via Federal Express

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

Case No. GO-2002-452

Dear Judge Roberts:

Enclosed for filing in the above-referenced case are an original and eight (8) copies of the Missouri Industrial Energy Consumers' Application to Intervene.

Thank you for your assistance in bringing this filing to the attention of the Commission.

Very truly yours,

Jeanie Vinglateke Diana M. Vuylsteke

DMV:dv

cc: All parties on the Commission's service list Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Review of the |) | |
|--------------------------------------|---|----------------------|
| Purchased Gas Adjustment Clauses |) | Case No. GO-2002-452 |
| In the Tariffs of Local Distribution |) | |
| Companies |) | |

APPLICATION TO INTERVENE

Company, DaimlerChrysler, Ford Motor, General Motors, Hussmann Refrigeration, Monsanto, Procter & Gamble Manufacturing, Nestle Purina PetCare, Solutia and Tyco Healthcare, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application to Intervene, the MIEC states as follows:

- 1. The MIEC is a group of large natural gas consumers;
- The MIEC's interest in this case is to avoid any adverse impact on the rates, terms and conditions of its natural gas service;
- 3. As large natural gas consumers, the MIEC's interest in this proceeding is different than that of the general public;
- 4. The MIEC does not yet have sufficient information to take a position in this case, but reserves the right to take positions on all issues that may affect its members in this case.
- 5. Granting the MIEC's proposed intervention would serve the public interest by assisting the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all counsel of record as shown on the Commission's official service list this 24th day of April, 2002.