

# BRYAN CAVE LLP

WASHINGTON, D.C.  
NEW YORK, NEW YORK  
KANSAS CITY, MISSOURI  
OVERLAND PARK, KANSAS  
PHOENIX, ARIZONA  
LOS ANGELES, CALIFORNIA  
SANTA MONICA, CALIFORNIA  
IRVINE, CALIFORNIA

ONE METROPOLITAN SQUARE, SUITE 3600  
ST. LOUIS, MISSOURI 63102-2750  
(314) 259-2000  
FACSIMILE: (314) 259-2020

LONDON, ENGLAND  
RIYADH, SAUDI ARABIA  
KUWAIT CITY, KUWAIT  
ABU DHABI, UNITED ARAB EMIRATES  
DUBAI, UNITED ARAB EMIRATES  
HONG KONG  
ASSOCIATED OFFICE IN  
SHANGHAI, PEOPLE'S REPUBLIC OF CHINA

DIANA M. SCHMIDT  
DIRECT DIAL NUMBER  
(314) 259-2543

INTERNET ADDRESS  
DSCHMIDT@BRYANCAVE.COM

February 9, 1999

FILED

FEB 10 1999

Missouri Public  
Service Commission

VIA FEDERAL EXPRESS

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
301 W. High Street  
Truman State Office Bldg.  
Jefferson City, MO 65101

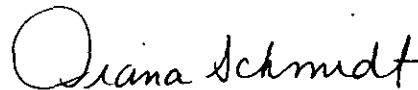
Re: Laclede Gas Company, Docket Nos. GT-99-303 and GR-99-315

Dear Judge Roberts:

Enclosed for filing are an original and fourteen (14) copies of the Missouri Industrial Energy Consumers' ("MIEC") Applications to Intervene in each of the above-referenced dockets. Also enclosed are additional copies of each application to be file-stamped and returned to me in the enclosed self-addressed, stamped envelope. Copies of these pleadings will be mailed to each party on the Commission's service list.

Thank you for your assistance in bringing these filings to the attention of the Commission.

Very truly yours,



Diana M. Schmidt

DMS:dv  
Enclosures (30)  
cc: All Parties of Record  
Mr. Don Johnstone

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

**FILED**  
FEB 10 1999  
Missouri Public  
Service Commission

In the Matter of Laclede Gas Company's       )  
Tariff Sheets to Revise Natural Gas       )       Case No. GR-99-315  
Rate Schedules.                               )

**APPLICATION TO INTERVENE OF THE  
MISSOURI INDUSTRIAL ENERGY CONSUMERS**

Pursuant to 4 CSR 240-2.080 and 4 CSR 240-2.110, Adam's Mark Hotels, Alcoa Foil Products (Alumax, Inc.), Anheuser-Busch Cos., Inc., The Boeing Company, Ford Motor Company, General Motors Corporation, Hussmann Refrigeration, MEMC Electronic Materials, Inc., Monsanto Company, Paulo Products Company, Procter & Gamble Manufacturing Company and Ralston Purina Company, collectively known as the "Missouri Industrial Energy Consumers" or "MIEC," file their Application to Intervene. In support of their Application and as grounds therefore, the MIEC state as follows:

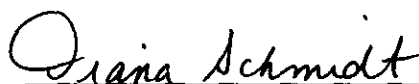
1.       The members of the MIEC are large industrial customers of Laclede Gas Company ("Laclede") and the rates for, and terms and conditions of, their natural gas service may be substantially affected by the outcome of this docket;
2.       The interest of the MIEC in this docket is to avoid adverse impact on the rates for, and terms and conditions of, their natural gas service;
3.       The MIEC oppose the relief sought by Laclede herein;
4.       As large customers of Laclede, the MIEC's interest in this proceeding is different than that of the general public; and

5. Intervention by the MIEC in this docket will serve the public interest by assisting the Commission in development of a more complete record for decision.

WHEREFORE, the MIEC request that the Commission grant their Application to Intervene herein and make them parties to this proceeding for all purposes.

Respectfully Submitted

BRYAN CAVE LLP



Diana M. Schmidt, #42419  
One Metropolitan Square, Suite 3600  
211 N. Broadway  
St. Louis, MO 63102-2750  
(314) 259-2543

ATTORNEY FOR MISSOURI  
INDUSTRIAL ENERGY CONSUMERS

**CERTIFICATE OF SERVICE**

I hereby certify that copies of this Application to Intervene have been served via first-class, U.S. mail, postage prepaid, on this 9th day of February, 1999, to all parties of record.

