

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

In the Matter of the Joint Application of Southern Union Company d/b/a Missouri Gas Energy, The Laclede Group, Inc., and Laclede Gas Company for an Order Authorizing the Sale, Transfer, and Assignment of Certain Assets and Liabilities from Southern Union Company to Laclede Gas Company and, in Connection Therewith, Certain other Related Transactions)
Case No. GM-2013-0254

APPLICATION TO INTERVENE

COMES NOW the City of Kansas City, Missouri (hereinafter sometimes Kansas City or City), pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure, and for its Application to Intervene respectfully states:

1. The City of Kansas City, Missouri, is a municipality of the State of Missouri.
2. Correspondence, communications, orders and the decision in this matter should be

addressed to:

Nelson Muñoz
Assistant City Attorney
17th Floor City Hall
414 E. 12th St.
Kansas City, MO 64106
Telephone No.: 816/513-3142
Fax No.: 816/513-3133

Mark W. Comley
Newman, Comley & Ruth P.C.
P.O. Box 537
Jefferson City, MO 65102-0537
Telephone No.: 573/634-2266
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3. This case arose when Southern Union Company d/b/a Missouri Gas Energy ("SUG"), The Laclede Group, Inc. and Laclede Gas Company (collectively "Joint Applicants")

filed a joint application requesting authority for a series of transactions whereby SUG will sell, transfer and assign to Laclede Gas the entire franchise, works and system of SUG's Missouri Gas Energy operating division, including its permits, municipal franchises, county consents and certificates of convenience and necessity. The joint applicants also seek other orders and authority. On January 15, 2013, the Commission issued an order and notice directing that interested parties wishing to intervene must do so on or before February 13, 2013. This application is therefore timely.

4. SUG provides service within the City's corporate limits under City franchise. Additionally, the City, acting through its several departments and affiliated agencies, is itself a consumer of energy supplied by SUG and recipient of funds allocated for demand side management initiatives including low income weatherization of qualifying structures.

5. The City's interest in this proceeding is different from that of the general public. It is interested in the impact of any decisions in this proceeding on behalf of itself, its residents, businesses or visitors, whose interests, and the City's, may be adversely affected by a final decision in this case. It desires to participate fully in this proceeding including hearing and the briefing of the issues.

6. The City believes that its participation in the matter will be important to the other parties, and would assist the Commission in any deliberations on the subject matter. Its intervention is in the public interest.

7. At this time, Kansas City is uncertain of the position it will take in this matter.

WHEREFORE, for the foregoing reasons, the City of Kansas City, Missouri, respectfully requests that the Commission grant its Application to Intervene in this matter, and thereby entitle the City to have notice and to appear at the taking of testimony, to produce and cross-examine

witnesses and to be heard on the argument, and in all other respects fully participate in this proceeding.

Respectfully submitted,

/s/ Mark W. Comley
Mark W. Comley #28847
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P.O. Box 537
Jefferson City, MO 65102-0537
(573) 634-2266
(573) 636-3306 (FAX)

Attorneys for City of Kansas City, Missouri

ATTORNEY VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for The City of Kansas City, Missouri which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.

/s/ Mark W. Comley
Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 30th day of January, 2013.

/s/ Annette M. Borghardt
Notary Public for Cole County, MO
Commission # 10436657; MCE 3/11/2014

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via email on this 30th day of January, 2013, to:

Office of Public Counsel at opcservice@ded.mo.gov;
General Counsel's Office at gencounsel@psc.mo.gov;
Todd J. Jacobs at Todd.Jacobs@SUG.com;
Michael C. Pendergast at mpendergast@lacledegas.com;
Paul A. Boudreau at paulb@brydonlaw.com.

/s/ Mark W. Comley
Mark W. Comley