JEROME A DIEKEMPER CARY HAMMOND RICHARD SHINNERS JOHN A. TURCOTTE, JR. JOSEPH W. LARREW PAUL C. HETTERMAN JAN BOND JANET E. YOUNG GREG A. CAMPBELL KARL A SAUBER RICHARD P. PERKINS ANN G. DALTON JANINE M. MARTIN KEITH P. UNGER KIMBERLY J. BETTISWORTH RICHARD C. WELCH



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March 12, 1999

FILED

Executive Secretary
Missouri Public Service Commission
Harry S. Truman State Office Building, Floor 5A
301 W. High St.
P.O. Box 360
Jefferson City, MO 65102

Missouri Public Service Commission

MAR 1 5 1999

RE: In the Matter of the Revised Tariff Sheets Setting forth Revised Rate Schedules and Certain Revised Charges for all of the Operating Divisions of Laclede Gas

Company GR-99-315

Dear Mr. Secretary:

Enclosed for filing are an original and 14 copies of an application to intervene out of time. Also enclosed is a copy to file stamp and return in the enclosed SASE. Thank you.

Very truly yours,

RICHÁRD P. PERKINS

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

ICE COMMISSION OF	MAR 1 ED
) Se ^M	MAR 1 5 1999 lissouri Public ice Commission
) Case No. GR-99-315)	Commission

CII _

In the Matter of the Revised Tariff Sheets Setting Forth Revised Rate Schedules and Certain Revised Charges for all of the Operating Divisions of Laclede Gas Company

APPLICATION TO INTERVENE OUT OF TIME

Come now Oil, Chemical & Atomic Workers, Local 5-6 ("Local 5-6"), by counsel, and request leave to intervene in this proceeding, pursuant to 4 CSR 204-2.075 and 240-2(4)(B). In support of this application, Local 5-6 states as follows:

1. All correspondence, filings, communications, orders, and decisions in this matter should be addressed to

Richard P. Perkins
Diekemper, Hammond, Shinners, Turcotte and Larrew, P.C.
7730 Carondelet, Suite 200
St. Louis, MO 63105
Phone: (314) 727-1015

Fax: (314) 727-6804

- 2. Local 5-6 is a labor organization and is the exclusive representative for employees of Laclede Gas Company covered by a collective bargaining agreement between Local 5-6 and Laclede Gas Company.
- 3. This matter involves an application by Laclede Gas Company to increase its current tariff rate schedules and charges, as more fully described in the January 26, 1999 letter of Laclede Gas Company.
- 4. Local 5-6 is vitally interested in protecting the interests of the employees of Laclede Gas Company which it represents. The rate schedules of Laclede Gas Company have a direct impact on the financial situation of Laclede Gas Company and, therefore, on the employees of Laclede Gas Company represented by Local 5-6. Thus, the manner in which this

matter is decided will affect the employees represented by Local 5-6. The interests of the employees represented by Local 5-6 differ from those of the Laclede Gas Company, the general public, or any other party; therefore, the employees represented by Local 5-6 are not adequately represented by the Public Counsel, Laclede Gas, or any other party to this proceeding.

- 5. Local 5-6 supports the application of Laclede Gas Company in this matter, but desires to participate in this proceeding to protect the interests of the employees and because it believes the views, expertise, and experience of the employees of Laclede Gas Company will aid the Commission in this matter and benefit the public interest.
- 6. The delay in filing this application to intervene was caused by the failure of the former counsel of Local 5-6 in matters before this Commission to advise Local 5-6 that he was leaving town and to adequately insure Local 5-6 was represented in a timely and effective manner and by the efforts of Local 5-6 to secure new counsel to represent it in this proceeding. Local 5-6 believes no party will be prejudiced, that this proceeding will not be delayed, and that the procedural schedule in this matter will not be effected by granting this application.

Therefore, Local 5-6 respectfully requests that the Commission issue an order authorizing it to intervene in this matter out of time.

DIEKEMPER, HAMMOND, SHINNERS, TURCOTTE AND LARREW, P.C.

7730 Carondelet, Suite 200 St. Louis, Missouri 63105

Phone: (314) 727-1015 Fax: (314) 727-6804

RICHARD P. PERKINS #36928

Attorneys for plaintiffs

COUNTY OF ST. LOUIS) ss STATE OF MISSOURI

AFFIDAVIT

Comes now Richard P. Perkins and upon his oath states: I, and the firm of Diekemper, Hammond, Shinners, Turcotte and Larrew, P.C., are the attorneys for Oil, Chemical & Atomic Workers, Local 5-6, instant applicant for intervention; we are authorized by Local 5-6 to act as its attorneys in this matter and to attest to this application; I have read this application, and I am familiar with the contents of it; and, the contents of this application are true to the best of my knowledge.

Subscribed and sworn to before me this 12th day of Margh, 1999.

My Commission Expires:

"NOTARY SEAL"

Barbara A. Seiber, Notary Public St. Louis County, State of Missouri My Commission Expires 10/30/2001

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, postage pre-paid, on the 12 /2 day of March, 1999, to:

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102 Gerald T. McNieve, Jr. Laclede Gas Company 720 Olive Street St. Louis, MO 63101

Ronald K. Evans Susan B. Knowles Uniion Electric Company d/b/a AmerenUE 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 Diana M. Schmidt Bryan Cave LLP 211 N. Broadway St. Louis, MO 65102-2750

John D. Landwehr Cook, Vetter, Doerhoff & Landwehr, P.C. 231 Madison Street Jefferson City, MO 65101

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