

February 17, 1999

FILED

FEB 18 1999

Missouri Public
Service Commission



Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, 7-N
Jefferson City, MO 65101

Re: Case No. GR-99-315

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter are an original and fourteen copies of Union Electric Company's Application For Intervention.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed envelope.

Sincerely,

A handwritten signature in black ink, appearing to read "R. K. Evans", written over a horizontal line.

Ronald K. Evans
Managing Associate General Counsel

RKE:dla

Enclosures

cc: Mr. Gerald T. McNeive, Jr., Laclede Gas Company
Office of the Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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Missouri Public
Service Commission

In the matter of Laclede Gas)
Company's tariff sheets to revise) Case No. GR-99-315
natural gas rate schedules.)

APPLICATION FOR INTERVENTION

COMES NOW Union Electric Company, d/b/a AmerenUE (hereinafter referred to as "AmerenUE"), by and through its counsel, and pursuant to Rule 4 CSR 240-2.075 of the Public Service Commission of Missouri (hereinafter referred to as the "Commission"), asks leave to intervene in this proceeding. In support of its Application For Intervention and as grounds therefor, AmerenUE states as follows:

1. AmerenUE is an electric utility regulated by the Commission which operates in the City of St. Louis, St. Louis County and significant portions of the eastern half of the State of Missouri, as well as in other areas of this and other states. Many of AmerenUE's electric customers are also gas customers of Laclede Gas Company ("Laclede").

2. On January 26, 1999, Laclede filed revised tariff sheets which set forth revised rate schedules designed to produce an increase of approximately \$30.5 million (or 6.1%) annually in the revenues of Laclede, exclusive of associated taxes. As a part of said filing, Laclede also proposes to alter the design of its existing General Service rate schedule.

3. AmerenUE's interest in the subject matter of this proceeding is different from that of the general public in the following respects and cannot be adequately represented by any other party to this proceeding.

AmerenUE's position is unique in that it, as stated above, is an electric utility with customers who are also gas customers of Laclede and competes with Laclede for revenues generated by such customers. On the basis of its unique position, AmerenUE was granted intervenor status by the Commission in Laclede's most recent rate increase filing, docketed as Case No. GR-98-374, and participated as such in said proceeding.

4. At this point, until Laclede's direct testimony and supporting documents are filed, AmerenUE has not been able to determine what position it will be taking on the various issues that will come before the Commission in this case.

WHEREFORE, based upon the above, AmerenUE requests that the Commission grant this Application For Intervention and allow AmerenUE to participate fully in all proceedings in this case with all rights and privileges accorded to a party.

Respectfully submitted,

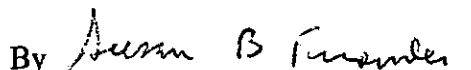
UNION ELECTRIC COMPANY
d/b/a AmerenUE

By



Ronald K. Evans
MBE #22597

By



Susan B. Knowles
MBE #39680

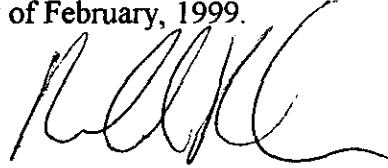
Its Attorneys
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(314) 554-2156
(314) 554-3183
Fax: (314) 554-4014

DATED: February 17, 1999

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing documents upon counsel for Laclede Gas Company and the Office of the Public Counsel.

Dated at St. Louis, Missouri, this 17th day of February, 1999.

A handwritten signature in black ink, appearing to read 'R. K. Evans', written over a horizontal line.

Ronald K. Evans