## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of Laclede Gas Company's Case No. GR-2007-0208
Tariff to Revise Natural Gas Rate Schedules Tariff No. YG-2007-0384

## APPLICATION TO INTERVENE OF THE MISSOURI ENERGY GROUP

Pursuant to 4 C.S.R. 240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure, Barnes-Jewish Hospital and SSM HealthCare (collectively known as the "Missouri Energy Group" and hereinafter referred to as "Applicants" or "MEG"), hereby apply for leave to intervene in the above-referenced proceeding. In support of this Application, Applicants respectfully state as follows:

- 1. The MEG is an ad hoc group of not-for-profit hospital systems located within the state of Missouri that have purchased substantial amounts of gas transportation services from Laclede Gas Company ("Laclede") and have actively participated in previous cases involving Laclede before this Commission.
- 2. As large-use customers, the rates and terms and conditions of the gas service of Applicants may be substantially and uniquely affected by the outcome of this docket. MEG's interests in this matter cannot be adequately represented by any other party.

- 3. It is Applicants' position that rates should be based upon cost of service. Applicants do not yet have sufficient information to take a position regarding specific issues raised and to be raised in Laclede's application and evidence in this case but reserve the right to take positions on all issues that may affect Applicants.
- 4. Granting intervention by Applicants in this case will serve the public interest by assisting the Commission in developing a more complete record for its decision; and
- 5. Correspondence or communications regarding this application, including service of all notices and orders of this Commission shall be addressed to:

Lisa C. Langeneckert, Esq. The Stolar Partnership LLP 911 Washington Avenue St. Louis, MO 63101-1290 llangeneckert@stolarlaw.com

WHEREFORE, having stated the grounds for intervention and the position and interest of the Applicants in these proceedings, Applicants ask that the Commission grant

this Application for Intervention and thereby entitle said Applicants to participate fully in this proceeding.

Respectfully submitted,

THE STOLAR PARTNERSHIP LLP

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## **CERTIFICATE OF SERVICE**

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this 2<sup>nd</sup> day of January, 2007 caused a copy of the foregoing to be served on all persons on the official service list in Case No. GR-2007-0208.

Lisa C. Langeneckert