# BRYAN CAVE LLP

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

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ONE METROPOLITAN SQUARE 211 NORTH BROADWAY, SUITE 3600 ST. LOUIS, MISSOURI 63102-2750 (314) 259-2000

FACSIMILE: (314) 259-2020

RIYADH, SAUDI ARABIA KUWAIT CITY, KUWAIT ABU DHABI, UNITED ARAB EMIRATES DUBAI, UNITED ARAB EMIRATES HONG KONG SHANGHAI, PEOPLE'S REPUBLIC OF CHINA IN ASSOCIATION WITH BRYAN CAVE. A MULTINATIONAL PARTNERSHIP.

LONDON, ENGLAND

FEB 1 0 2000

Missouri Public Service Commission

INTERNET ADDRESS DS5@BRYANCAVELLP.COM

DIANA M. VUYLSTEKE

DIRECT DIAL NUMBER (314) 259-2543

February 9, 2000

### VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Truman Building, Fifth Floor 301 West High Street Jefferson City, MO 65101

Re:

Case No. GO-2000-395

Dear Mr. Roberts:

Enclosed for filing with the Commission are an original and fourteen (14) copies of the Missouri Industrial Energy Consumers' Application to Intervene in the above-referenced case.

Thank you for your assistance in bringing this filing to the attention of the Commission, and please call me if you have any questions.

Very truly yours,

Diana M. Vuylsteke

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DMS/dv

**Enclosures** 

cc:

Mr. John Mallinckrodt

All Parties of record

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



In the Matter of Laclede Gas Company's	)	Case No. GO-2000-3 Service Commission
Gas Supply Incentive Plan (GSIP II)	)	Commission

# 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, Mallinckrodt, Inc., MEMC

Electronic Materials, Inc., Monsanto Company, Procter & Gamble Manufacturing Company,

Ralston Purina Company and Solutia, 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 case 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. Vuylsteke, #42419

One Metropolitan Square, Suite 3600

211 N. Broadway

St. Louis, MO 63102-2750

(314) 259-2543

ATTORNEY FOR THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Juan's Vingletake

#### **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, 2000, to all parties of record.