

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

In the Matter of Laclede Gas Company's )	
Tariff to Revise Natural Gas Rate )	Case No. GR-2010-0171
Schedules )	

**MOTION TO FILE APPLICATION OF USW LOCAL 11-6  
TO INTERVENE OUT OF TIME**

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and respectfully moves this Commission for permission to file its application to intervene in this proceeding out of time. In support of this application, Local 11-6 states:

1. By order dated December 10, 2009 ("Order"), the Commission set December 30, 2009 as the deadline for filing notice of intervention in this matter.
2. Due to holiday mail congestion and the holidays themselves, Local 11-6's counsel did not receive the order until after the deadline.
3. Local 11-6's late filing will not prevent it from meeting the other deadlines set forth in the Order. With regard to the deadline set for January 11, 2010 to set forth a position as to true-up, Local 11-6 does not take an independent position as to true-up, but agrees to the consensus position of the other parties.

WHEREFORE, USW Local 11-6 respectfully requests the Commission for permission to file out of time its application for intervention, which is being submitted contemporaneously..

Respectfully submitted,

/s/ Sherrie A. Schroder

Sherrie A. Schroder, MBN 40949  
Michael A. Evans, MBN 58583  
HAMMOND and SHINNERS, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
[saschroder@hammondshinners.com](mailto:saschroder@hammondshinners.com) (email)  
[mevans@hammondshinners.com](mailto:mevans@hammondshinners.com) (email)  
Attorneys for USW Local 11-6

**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this January 11, 2010.

/s/ Sherrie A. Schroder