

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Laclede Gas Company's)
Filing of Revised Tariffs to Increase its Annual) File No. GR-2013-0171
Revenues for Natural Gas) Tariff No. YG-2013-0292

APPLICATION TO INTERVENE

COMES NOW ST. CHARLES COUNTY, STATE OF MISSOURI, and pursuant to 4 CSR 240-2.075 and this Commission's Order Directing Notice and Setting Intervention Date dated December 27, 2012, makes this application to intervene in the above captioned matter. In support of its Application, St. Charles County (hereafter "proposed intervenor") makes the following statements.

1. Proposed intervenor's legal name is St. Charles County, State of Missouri, and it is a political subdivision of the State of Missouri, with all powers granted to it under the St. Charles County Charter adopted in 1992 pursuant to Article VI, section 18 of the Constitution of Missouri.
2. The street and mailing address of proposed intervenor's principal office is:

Office of the St. Charles County Executive, 100 North Third
Street, St. Charles, Missouri 63301.
3. The street and mailing address of proposed intervenor's undersigned attorney is:

Office of the St. Charles County Counselor, 100 North Third
Street, St. Charles, Missouri 63301.
4. The email address, fax number, and telephone number of proposed intervenor's

undersigned attorney are:

hellis@sccmo.org; 636-949-7541 (fax); 636-949-7540 (tel.).

5. Proposed intervenor has a particular interest in this case which is different from the general public's interest and which may be adversely affected by a final order arising from this case because:
 - a. As a large consumer of natural gas that pays commercial rates, proposed intervenor's interest is not represented by the Office of Public Counsel;
 - b. As a large consumer of natural gas delivered to multiple facilities at multiple locations, proposed intervenor's interest can be affected adversely by billing practices that may be approved or required by this Commission; and
 - c. As a county that collects a road and bridge capital improvements tax approved by the voters pursuant section 67.700, RSMo, as amended, and spends its proceeds on road improvement projects in St. Charles County, proposed intervenor has a particular interest in Laclede Gas Company's request for a rate increase to the extent that it is based on relocations of infrastructure due to such road projects that may or may not have been reimbursed either by proposed intervenor or by municipalities within St. Charles County.
6. Proposed intervenor's intervention in this case is also in the public interest for the

reasons stated above in paragraph 5, especially subparagraph c.

7. Proposed intervenor neither supports nor opposes the relief sought by Laclede Gas Company in this case and at present is unsure of the position that it will take.

Respectfully submitted,

OFFICE OF THE ST. CHARLES
COUNTY COUNSELOR

/s/ Harold A. Ellis

Harold A. Ellis, #39944

Attorneys for Proposed Intervenor St.
Charles County

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Certificate of Service

A true and accurate copy of the above and foregoing was served this 14th day of January, 2013, by first-class mail, postage prepaid, by electronic mail, and by facsimile transmission, upon: Michael C. Pendergast, Vice President and Associate General Counsel, Laclede Gas Company, 720 Olive Street (1520), St. Louis, MO 63101, mpendergast@lacledegas.com, 314-421-1979 (fax).

/s/ Harold A. Ellis

Harold A. Ellis, #39944