



L A S H L Y & B A E R, P. C.

August 29, 2002

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FILED

AUG 30 2002

Mr. Dale Hardy Roberts
Executive Secretary
Missouri Public Service Commission
200 Madison Street
P. O. Box 360
Jefferson City, Missouri 65102-0360

Missouri Public
Service Commission

Re: In the Matter of the Tariff Filing of Laclede Gas Company
Case No. GT-2003-0032, Tariff No. JG-2003-0048

Dear Mr. Roberts:

Enclosed please find for filing the original plus eight (8) copies of an Application to Intervene on behalf of The Board of Education of the City of St. Louis in the above-captioned matter.

If you have any questions concerning the enclosed filing, please let me know. Thank you.

Very truly yours,

Robert E. McWilliams

REM/wlm

Enclosures

cc: All counsel of record

FILED

AUG 30 2002

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

IN THE MATTER OF THE TARIFF) Case No. GT-2003-0032
FILING OF LACLEDE GAS COMPANY) Tariff No. JG-2003-0048

APPLICATION TO INTERVENE

COMES NOW, The Board of Education of the City of St. Louis (hereinafter "Board of Education") by and through its Counsel, Lashly & Baer, P.C., Kenneth C. Brostron and Robert E. McWilliams, Jr. and for its Application to Intervene pursuant to 4 CSR 240-2.075, states:

1. The Board of Education is a body corporate and metropolitan school district established pursuant to Section 162.571, *et seq.*, R.S.Mo., to provide public education to persons of school-age in the City of St. Louis, Missouri. The Board of Education operates the St. Louis Public Schools consisting of 112 school buildings. The Board of Education also operates 12 administrative and maintenance facilities.

2. The Missouri Ninety-First General Assembly, Second Regular Session, passed CCS for SCS for HB 1402 which enacted, *inter alia*, Section 393.310, R.S.Mo., which provides that Missouri gas corporations are required to file a set of experimental tariffs with the Missouri Public Service Commission. Those tariffs are required, *inter alia*, to provide for the aggregate purchasing of natural gas supplies and pipeline transportation services, including storage, on behalf of eligible school entities, in accordance with aggregate purchasing contracts negotiated by and through a not-for-profit school association. The

Board of Education is an “eligible school entity” as defined by that statute, and as such is authorized to participate in and benefit from, the described aggregate purchasing. The Board of Education incurs significant utility costs in the operation of its 124 buildings and facilities, and therefore, likely will be impacted by the experimental tariffs approved in this proceeding.

3. The Board of Education thus has an interest in this proceeding which is different from that of the general public and which may be adversely affected by a final order arising from this proceeding.

4. All correspondence and filings relating to this matter should be directed to: Robert E. McWilliams, Jr., Lashly & Baer, P.C., 714 Locust Street, St. Louis, Missouri 63101, (314) 621-2939 (telephone), (314) 621-6844 (facsimile), remcwill@lashybaer.com (electronic mail address).

5. In connection with the filing of this Application, Counsel for the Board of Education has contacted Counsel for Laclede Gas, the General Counsel’s Office of the Commission, and Counsel for the Missouri School Boards’ Association, and they have no objection to the filing of this Application. Moreover, no other party will be prejudiced by the filing of this Application, nor by the Board of Education’s intervention in this proceeding.

WHEREFORE, The Board of Education of the City of St. Louis respectfully requests the Commission to issue an order permitting the Board of Education to intervene in the above-captioned matter.

Respectfully submitted,

LASHLY & BAER, P.C.

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ATTORNEYS FOR INTERVENOR

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been mailed to the following on this 29th day of August, 2002:

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