# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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) (	Case No. GC-2006-0378
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Respondents.

## **APPLICATION TO INTERVENE**

COMES NOW Laclede Gas Company ("Laclede") and, pursuant to 4 CSR 240-2.075 of the Commission's Rules of Practice and Procedure, respectfully files this Application to Intervene in the above-captioned proceeding, stating as follows:

- 1. Laclede is a gas corporation and a public utility, operating as a distributor and seller of natural gas in the City of St. Louis, St. Louis County and various other counties in Eastern Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101.
- 2. Laclede has an interest in this case, because Laclede is a transportation customer of Respondent Missouri Pipeline Company, LLC. Laclede purchases a considerable amount of pipeline transportation service from this Respondent. Payments made to this entity for such service are passed on to Laclede's customers. Accordingly, Laclede and its customers will be affected by the outcome of this case.

3. At this time, Laclede does not have sufficient information to determine what position it will take in this case.

4. As a gas corporation that makes substantial purchases from a Respondent, Laclede's interest in this case differs from that of the general public. Laclede is interested in maintaining reliable pipeline transportation service at a reasonable cost for the benefit of its customers. As a result, Laclede may be adversely affected by a final order issued in this case. Finally, Laclede asserts that granting the proposed intervention would serve the public interest.

WHEREFORE, for the reasons stated herein, Laclede respectfully requests that the Commission issue an order permitting Laclede to intervene as a party in this case.

Respectfully submitted,

### /s/ Michael C. Pendergast

Michael C. Pendergast, Mo. Bar #31763 Vice President and Associate General Counsel Rick Zucker, Mo. Bar #49211 Assistant General Counsel

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Application to Intervene has been duly served upon the parties set forth below via electronic mail, fax, or by placing a copy thereof in the United States mail, postage prepaid, on this 2nd day of May, 2006.

#### /s/ Gerry Lynch

Thomas R. Schwarz, Jr. Lera L. Shemwell Shelley E. Syler Public Service Commission P. O. Box 360 Jefferson City, Missouri 65102

Missouri Pipeline Company, LLC; Missouri Gas Company, LLC; Omega Pipeline Company, LLC: Mogas Energy, LLC; United Pipeline Systems, Inc.; and Gateway Pipeline Company, LLC.
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