

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

In the Matter of Laclede Gas Company's Tariff	)	
Revision Designed to Clarify its Liability for	)	Case No. GT-2009-0056
Damages Occurring on Customer Piping and	)	Tariff No. JG-2009-0145
Equipment.	)	

**VERIFIED APPLICATION OF USW LOCAL 11-6  
TO INTERVENE**

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this application, Local 11-6 states:

1. This matter involves a tariff revision filed by Laclede Gas Company designed to clarify its liability for damages occurring on customer piping and equipment beyond the Company's meter.

2. Local 11-6 is a labor organization that represents for purposes of collective bargaining approximately 1050 of Laclede's employees in "physical" classifications such as production, maintenance, operations, and distribution jobs.

3. The principal place of business for Local 11-6 is located at 7750 Olive Boulevard, St. Louis, Missouri 63130. The telephone number for Local 11-6 is (314) 721-8448, and its fax number is (314) 721-8789. Local 11-6's electronic mail address is [gasworkerslocal@sbcglobal.net](mailto:gasworkerslocal@sbcglobal.net).

4. Although Local 11-6 is, technically, an unincorporated association, labor unions are not required to register their names as fictitious names with the Missouri Secretary of State. Thus, Local 11-6 does not have evidence of any such registration.

5. Though Local 11-6 is an "association," it does not seem to be the type of association to which 4 CSR 240-2.060(1)(J) and 4 CSR 240-2.075(3) are directed. It does not appear to be the intent of those regulatory subsections for Local 11-6 to file a list of all of its members, and Local 11-6 hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that Local 11-6 must comply with the subsection, the required list will be tendered immediately.

6. All correspondence, communications, orders, and decisions of the Commission here should be sent to:

Michael A. Evans, MBN 58583  
HAMMOND, SHINNERS, TURCOTTE,  
LARREW and YOUNG, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)  
[mevans@hstly.com](mailto:mevans@hstly.com) (email)

7. Local 11-6 does not have any pending actions or final unsatisfied judgments or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).

8. Local 11-6 does not have any annual reports or assessment fees that are overdue.

9. Local 11-6 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

10. As the exclusive collective bargaining representative of certain of Laclede's non-managerial, non-professional employees, Local 11-6 and the employees it represents have interests in this proceeding which are clearly different from those of the general public. Where the public's interests here are concentrated in the safe and dependable delivery of natural gas and related products and services at a reasonable cost,

Local 11-6 and the employees it represents are also concerned with the impact of the requested tariff revision on its members' jobs and other terms and conditions of their employment.

11. No other party to this proceeding can adequately represent the additional, legitimate concerns of Local 11-6 and the employees it represents here.

WHEREFORE, USW Local 11-6 respectfully asks the Commission to grant this application and to permit Local 11-6 to intervene here.

Respectfully submitted,

/s/ Michael A. Evans

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Attorneys for USW Local 11-6

**VERIFICATION**

COMES NOW Michael A. Evans and upon his oath states that he is a licensed attorney in good standing in Missouri, that he is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of his knowledge, information, and belief. Mr. Evans further states that he has been authorized to sign and file this application on behalf of USW Local 11-6.

  
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MICHAEL A. EVANS

Subscribed and sworn to before me this 19<sup>th</sup> day of September, 2008.

My Commission Expires:

2/28/2011

  
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Notary Public



MELANIE E. WILHELM  
My Commission Expires  
February 28, 2011  
St. Louis County  
Commission #07017667

**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on September 19, 2008, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

\_\_\_\_\_  
/s/ Michael A. Evans