# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a	)	
Ameren Missouri's Filing to Change Criteria for	)	File No. GE-2014-0180
Assessment of New Customer Deposits	)	

### **APPLICATION TO INTERVENE**

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

- 1. Laclede is a public utility and gas corporation incorporated under the laws of the State of Missouri, with its principal office located at 720 Olive Street, St. Louis, Missouri 63101. A Certificate of Good Standing evidencing Laclede's standing to do business in Missouri was submitted in Case No. GM-2013-0254 and is incorporated by reference herein for all purposes. The information in such Certificate is current and correct.
- 2. Laclede is engaged in the business of distributing and transporting natural gas to customers in numerous counties in both eastern and western Missouri as a gas corporation subject to the jurisdiction of the Commission. Laclede conducts business in its western Missouri service territory through its Missouri Gas Energy division under the fictitious name of Missouri Gas Energy. A copy of a certificate from the Missouri Secretary of State that Missouri Gas Energy is a registered fictitious name of Laclede Gas Company was submitted in Case No. GO-2014-0179 and is incorporated herein by reference.
  - 3. Communications in regard to this Application should be addressed to:

Rick Zucker
Assistant General Counsel
Laclede Gas Company
720 Olive Street, 14<sup>th</sup> Floor
St. Louis, MO 63101
(314) 342-0533
rick.zucker@thelacledegroup.com

- 4. Other than cases that have been docketed at the Commission, Laclede has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates.
- 5. Laclede is current on its annual report and assessment fee obligations to the Commission, and no such report or assessment fee is overdue.
- 6. On December 9, 2013, Union Electric Company, d/b/a Ameren Missouri ("Ameren") filed a Request for Variance to permit it to use credit rating criteria in determining whether it will request a deposit from a new residential gas service customer. As a local gas distribution company that has credit scoring criteria in both its Laclede and MGE tariffs, Laclede has an interest in this case that differs from that of the general public. Further, to the extent that the Commission develops a policy on, or even forms an impression of, credit scoring for deposits as a result of this case, it is possible that Laclede's interests may be adversely affected by a final order herein.
- 7. Finally, Laclede believes that granting intervention will serve the public interest, as Laclede's and MGE's experience in credit scoring for deposits may assist the Commission in better understanding this issue.
- 8. For a number of reasons that were touched on in Case No. AX-2013-0091, Laclede is generally supportive of credit scoring in determining whether to seek deposits

from new residential customers and supports the applicant in the relief it seeks in this case.

**WHEREFORE,** for the foregoing reasons, Laclede Gas Company respectfully requests that the Commission grant Laclede's Application to Intervene in this proceeding.

Respectfully submitted,

#### /s/ Rick Zucker

Rick Zucker, Mo. Bar #49211 Associate General Counsel Laclede Gas Company 720 Olive Street, 14<sup>th</sup> Floor St. Louis, MO 63101

Telephone:

(314) 342-0533

Fax:

(314) 421-1979

Email:

rzucker@lacledegas.com

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing pleading has been duly served upon the General Counsel of the Staff of the Public Service Commission and the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 31st day of December, 2013.

/s/ Rick Zucker

Rick Zucker

## **VERIFICATION**

STATE OF MISSOURI	)
	) SS.
CITY OF ST. LOUIS	)

I, Ron Crow, being first duly sworn, verify that I am an authorized officer of Laclede Gas Company. I have read the foregoing application and state that it is true and correct to the best of my knowledge, information and belief.

Ron Crow

Subscribed and sworn to before me this 31st day of December, 2013.

JILL CALVERT SNARE
Notary Public - Notary Seal
STATE OF MISSOURI
St. Louis County
My Commission Expires: Sept. 29, 2017
Commission # 13532121

Votary Public

My Commission expires: 9-29-2017