

FILED²

JUN 20 2005

Missouri Public
Service Commission

Case No.

Tariff No. JG-2005-0976

AND ENERGY WORKERS LOCAL NO. 5-6, AFL-CIO, TO INTERVENE

COMES NOW Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-6, AFL-CIO ("Local 5-6"), by counsel, and respectfully requests that this Commission reconsider its approval of the tariff revision effective June 10, 2005, pursuant to 4 CSR 240-2.160(2) and respectfully applies to this Commission for permission to intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this motion and application, Local 5-6 states:

1. This matter involves a proposed tariff revision submitted to this Commission by Laclede Gas Company ("Laclede"), which tariffs impact public safety in natural gas service provided to customers in Laclede's Missouri service area.

2. Local 5-6 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. Although Local 5-6 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 5-6 does not have evidence of any such registration.

4. The principal place of business for Local 5-6 is located at 7750 Olive Boulevard, St. Louis, Missouri 63130. The telephone number for Local 5-6 is (314) 721-8448, and its fax number is (314) 721-8789. Local 5-6's electronic mail address is gasworkerslocal@sbcglobal.net.

5. Though Local 5-6 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 5-6 to file a list of all of its members, and Local 5-6 hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that Local 5-6 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:

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7. Local 5-6 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 5-6 does not have any annual reports or assessment fees that are overdue.

9. Local 5-6 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

10. The Office of Public Counsel was apparently not involved in this case. As detailed below, Laclede's requested revised tariffs pose genuine safety concerns to the public, and said concerns should be explored, addressed, and ruled upon by the Commission.

11. Laclede Gas requested that revised tariff sheets that it filed May 10, 2005 be approved by the Commission.

12. On P.S.C. MO. No. 5 Consolidated, Fifth Revised Sheet No. R-11, Laclede requested a change to allow remote meter readings to constitute actual meter readings. Presently, Laclede is required to obtain an actual inside meter reading from locations having inside meters on an annual basis. Allowing Laclede to utilize remote readings as actual readings is a grave public safety issue. Only two years ago, Laclede required that its meter readers begin wearing detection devices that automatically trigger a service call if, when a meter reader makes an annual inside read, the detection sensor finds natural gas odor. This current, mandatory safety precaution will be lost should the annual readings be abandoned and remote meter readings be allowed to constitute actual, inside meter readings.

13. On P.S.C. M.O. No. 5 Consolidated, Sixth Revised Sheet No. R-14, Laclede requested a variance from the current practice of conducting a physical inspection of all gas appliances at a customer's house when service is conveyed from one customer to another. Under the proposed revised tariffs, only in the instance where gas has been physically disconnected at premises will an inspection be required upon reestablishing service. Under the proposed tariff, Laclede may continue gas supply to


premises if requested by the succeeding customer, thus nullifying the inspection currently made upon a transfer of service from one party to another.

14. These matters have not been, but should be, addressed by the Commission, rather than simply allowing the proposed tariff revisions to become effective as an operation of law, which has occurred in this case.

15. Local 5-6 objects to allowing the proposed tariffs to be implemented.

16. No other party to this proceeding has adequately represented the additional, legitimate concerns of Local 5-6 and the employees it represents.

WHEREFORE, Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO, respectfully asks the Commission to grant its motion for reconsideration and grant this application to permit Local 5-6 to intervene here,


JULIA R. ENGELHARDT, MBN 45400
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Chemical, and Energy Workers Local
No. 5-6, AFL-CIO

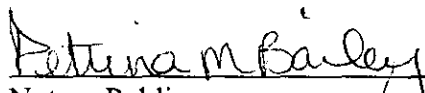
VERIFICATION

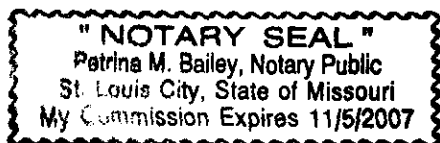
COMES NOW Julia R. Engelhardt and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Engelhardt further states that she has been authorized to sign and file this application on behalf of Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO.


JULIA R. ENGELHARDT

Subscribed and sworn to before me this 15 day of June, 2005.

My Commission Expires:


Notary Public



Union Appendix 1

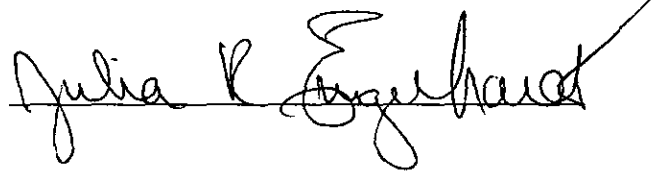
Joseph Schulte
7750 Olive Blvd.
St. Louis, Missouri 63130
(314) 721-8448 Work
President of Local 5-6

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, this 15th day of June, 2005, postage pre-paid to:

Secretary of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Michael C. Pendergast
720 Olive Street
St. Louis, MO 63101

A handwritten signature in cursive script, reading "Julia R. Engelhardt", written over a horizontal line.