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March 16, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Ste. 100
Jefferson City, MO 65102-0360

FILED²
MAR 19 2001
Missouri Public
Service Commission

Re: Case No. GM-2001-342

Dear Mr. Roberts:

Enclosed for filing on behalf of the Missouri Energy Group are an original and seven (7) copies of its Reply to the Response of Laclede Gas Company to the Late-Filed Application to Intervene of the Missouri Energy Group. I will appreciate your bringing this filing to the attention of the Commission. An additional copy of this Application is enclosed which I would appreciate your file stamping and returning in the enclosed, pre-addressed envelope.

Thank you for your attention to this matter.

Yours very truly,



Lisa C. Langeneckert

gmw
Enclosures (10)
cc: All Counsel of Record

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

FILED²
MAR 19 2001

Missouri Public
Service Commission

In the Matter of the Application of Laclede)
Gas Company for an Order Authorizing)
Its Plan to Restructure Itself Into a Holding)
Company, Regulated Utility Company, and)
Unregulated Subsidiaries.)

Case No. GM-2001-342

**REPLY TO LACLEDE GAS COMPANY'S RESPONSE
TO THE LATE-FILED APPLICATION TO
INTERVENE OF THE MISSOURI ENERGY GROUP**

COMES NOW, the Missouri Energy Group ("MEG") and for its Reply to the Response of Laclede Gas Company in opposition to its Late-Filed Application to Intervene states as follows:

1. The MEG has participated in rate proceedings involving Laclede Gas Company through the Public Service Commission ("Commission") for a period of over twenty years. In all that time, it has been rare for the MEG to request admittance to a proceeding after the time to intervene has passed. In this case, the MEG was not made aware of this case until it received the Commission's email agenda for the following week which reflected the original date for the prehearing conference. Within a day of receiving that agenda notice, the MEG filed its Application to Intervene.

2. The MEG is comprised of large industrial companies and hospitals who purchase gas and transportation services from Laclede Gas Company. No other large industrial companies have intervened in this case, and denying the MEG intervention would mean that industry would have no meaningful representation in this case.

3. The MEG does not intend to delay the progress of this case and understands that, if its request for late-filed intervention is granted, it must accept the case as it exists at this point.

In fact, counsel for MEG was present at the prehearing conference held in this case on March 13, 2001 and indicated a willingness to accept the proposed procedural schedule as agreed to by all parties at the informal discussions held thereafter.

WHEREFORE, for the foregoing reasons, MEG believes that it has shown that good cause exists for the Commission to grant its request to intervene out of time and respectfully requests that the Commission grant its intervention request.

Respectfully Submitted,


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Attorneys for Missouri Energy Group

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing to be served on all persons on the official service list in Case No. GM-2001-309.

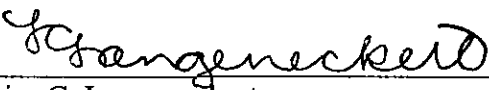
Dated at St. Louis, Missouri this 16th day of March, 2001:

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