

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Office of the Public Counsel,)
)
 Complainant,)
)
 v.)
)
 Laclede Gas Company, and)
 Missouri Gas Energy,)
)
 Respondents.)

Case No. GC-2016-0297

**RESPONSE TO CONSUMERS COUNCIL OF MISSOURI'S
APPLICATION TO INTERVENE**

COME NOW Respondents Laclede Gas Company (“Laclede” or “Company”), including its Laclede Gas (herein so called) operating unit, and Missouri Gas Energy (“MGE”), and submit this response to the Application to Intervene (“Application”) filed by the Consumers Council of Missouri (“CCM”) in the above referenced case, and in support thereof state as follows:

1. On April 28, 2016, the Commission issued an order in this case which, among other things, set Friday, May 20, 2016 as the deadline to apply for intervention in this case. Timely applications were filed by the Missouri Energy Consumers Group and the Missouri Division of Energy.

2. CCM filed the Application on Sunday, May 22. CCM’s Application should be denied for two reasons. First, CCM’s application missed the intervention deadline. It gave no reason for doing so, and did not ask for permission to late file.

3. Second, CCM’s interest does not differ from that of the general public. Commission Rule 2.075(3) provides that an intervenor must either have an interest that is different from the general public, or show that granting intervention would serve the public interest. (4 CSR 240-2.075(3)) CCM represents Missouri consumers, which effectively mirrors

the general public. In fact, consumers represented by CCM have the same interest in this case as the consumers who are already represented by the Complainant itself. Since the consumers served by CCM are already represented, it would not serve the public interest to duplicate this representation through another organization.

WHEREFORE, Laclede respectfully requests that the Commission deny the application to intervene filed by CCM.

Respectfully Submitted,

/s/ Rick Zucker

Rick Zucker, Mo. Bar #49211
Associate General Counsel - Regulatory
Laclede Gas Company
Missouri Gas Energy
700 Market Street, 6th Floor
St. Louis, MO 63101
Telephone: (314) 342-0532
Fax: (314) 421-1979
Email: rick.zucker@spireenergy.com

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the parties of record in this case on this 31st day of May, 2016 by United States mail, hand-delivery, email, or facsimile.

/s/ Rick Zucker