

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

In the Matter of the Joint Application of)	
Southern Union Company d/b/a Missouri Gas)	
Energy, The Laclede Group, Inc. and Laclede)	
Gas Company for an Order Authorizing the Sale,)	Case No. GM-2013-0254
Transfer, and Assignment of Certain Assets and)	
Liabilities from Southern Union Company to)	
Laclede Gas Company and, in Connection)	
Therewith, Certain other Related Transactions)	

**VERIFIED APPLICATION OF USW DISTRICT 11
TO INTERVENE**

COMES NOW United Steelworkers District 11, AFL-CIO (“USW”), 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, USW states:

1. This matter involves an application filed by Southern Union Company d/b/a Missouri Gas Energy (“Missouri Gas”) and Laclede Gas Company (“Laclede”) relating to the sale of Missouri assets of Missouri Gas to Laclede.

2. USW is a labor organization that represents gasworkers in several bargaining units of both Missouri Gas and Laclede.

3. USW is an unincorporated association. However, since labor unions are not required to register their names as fictitious names with the Missouri Secretary of State, USW does not have evidence of any such registration. USW may be contacted at the address and telephone number listed here:

Ron Wilke
Staff Representative
USW District 11
10523 Glen Oak Drive
Festus, MO 63028-3135
636-524-1239

4. Though USW 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) is directed. It does not appear to be the intent of those regulatory subsections for USW to file a list of all of its members, and USW hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that USW must comply with the subsection, the required list will be tendered immediately.

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

Sherrie Hall, MBN 40949
Michael A. Evans, MBN 58583
HAMMOND and SHINNERS, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
sahall@hammondshinners.com (E-mail)
mevans@hammondshinners.com (email)

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

7. USW does not have any annual reports or assessment fees that are overdue.

8. USW seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

9. As the exclusive collective bargaining representative of certain of Missouri Gas' and Laclede's non-managerial employees, USW and the employees it represents have interests in this proceeding which are clearly different from those of Missouri Gas, Laclede, the general public, or any other party. Where the public's interests here are

concentrated in the safe and dependable delivery of power at a reasonable cost, USW and the employees it represents are additionally concerned with the impact the proposed sale could have on jobs, pensions, and other terms and conditions of employment.

10. No other party to this proceeding can adequately represent the additional, legitimate concerns of USW and the employees it represents here.

WHEREFORE, USW respectfully ask the Commission to grant this application and to permit USW to intervene here.

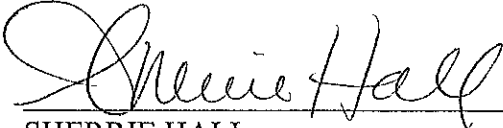
Respectfully submitted,

/s/ Sherrie Hall

SHERRIE HALL, MBN 40949
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Attorneys for IBEW USW

VERIFICATION

COMES NOW Sherrie Hall 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. Hall further states that she has been authorized to sign and file this application on behalf of USW.

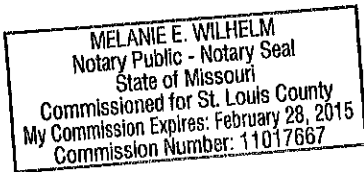


SHERRIE HALL

Subscribed and sworn to before me this 22nd day of January, 2013.

My Commission Expires:


Notary Public



Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on January 22, 2013, 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/ Sherrie Hall