

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

Staff of the Public Service Commission)	
of Missouri,)	
)	
Complainant,)	
)	Case No. GC-2006-0318
v.)	
)	
Laclede Gas Company,)	
)	
Respondent.)	

**VERIFIED APPLICATION OF UNITED STEEL, PAPER AND FORESTRY,
RUBBER, MANUFACTURING, ENERGY, ALLIED-INDUSTRIAL
AND SERVICE WORKERS INTERNATIONAL UNION,
LOCAL NO. 11-6 TO INTERVENE**

COMES NOW United Steel, Paper And Forestry, Rubber, Manufacturing, Energy, Allied-Industrial And Service Workers International Union, Local No. 11-6 ("Local 11-6"), 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, Local 11-6 states:

1. This matter involves a complaint filed by the staff of the Public Service Commission of Missouri ("PSC"), alleging 1) that Laclede Gas has been improperly estimating gas usage, and 2) that Laclede Gas has failed to promptly investigate and remedy the unsafe condition of gas usage continuing to flow to premises at which service has been discontinued.

2. Local 11-6 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. The principal place of business for Local 11-6 is located at 7750 Olive Boulevard, St. Louis, Missouri 63130. The telephone number for Local 11-6 is (314) 721-8448, and its fax number is (314) 721-8789. Local 11-6's electronic mail address is gasworkerslocal@sbcglobal.net.

4. Although Local 11-6 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 11-6 does not have evidence of any such registration.

5. Though Local 11-6 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 11-6 to file a list of all of its members, and Local 11-6 hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that Local 11-6 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:

Sherrie A. Schroder
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7730 Carondelet, Suite 200
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(314) 727-6804 (Fax)
saschroder@dhstl.com (E-mail)

7. Local 11-6 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 11-6 does not have any annual reports or assessment fees that are overdue.

9. Local 11-6 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.

10. As the exclusive collective bargaining representative of certain of Laclede's non-managerial, non-professional employees, Local 11-6 and the employees it represents have interests in this proceeding which are clearly different from those of the general public. Where the public's interests here are concentrated in the safe and dependable delivery of natural gas and related products and services at a reasonable cost, Local 11-6 and the employees it represents are also concerned with their safety as service providers in the delivery of natural gas and related products. Additionally, Local 11-6 is concerned about the impact of any relief granted under the Complaint on its members' jobs and other terms and conditions of their employment. Furthermore, Local 11-6 is participating in three related matters in front of the PSC involving Laclede: Case No. GE 2005-0405, concerning changes to Laclede's meter testing program; Case No. GC-2006-0600, concerning safety issues resulting from Laclede's elimination of certain physical premises inspections when estimating gas usage and when performing turn off/turn ons of gas service; and Case No. GC-2006-0313, concerning a change in the method of changing meters on the outside of a house. These cases have similar and overlapping issues, concerned as they are with the impact on various changes in Laclede's safety processes and the potential impact of such changes on public and employee safety,


making it imperative that Local 11-6 also be permitted to participate in the present matter.

11. No other party to this proceeding can adequately represent the additional, legitimate concerns of Local 11-6 and the employees it represents here.

12. Local 11-6 supports the relief sought by complainant.

WHEREFORE, United Steel, Paper And Forestry, Rubber, Manufacturing, Energy, Allied-Industrial And Service Workers International Union, Local No. 11-6 respectfully asks the Commission to grant this application and to permit Local 11-6 to intervene here.

Respectfully submitted,



SHERRIE A. SCHRODER, MBN 40949
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Attorneys for United Steel, Paper And
Forestry, Rubber, Manufacturing, Energy,
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International Union, Local No. 11-6

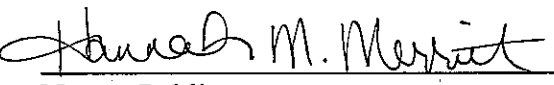
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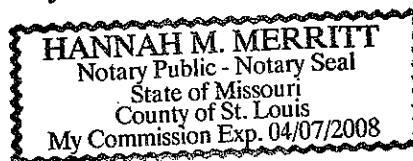
COMES NOW Sherrie A. Schroder and upon her oath states that she is a licensed attorney in good standing in Missouri, that she is familiar with the matters set forth in this application, and that the matters alleged are true and correct to the best of her knowledge, information, and belief. Ms. Schroder further states that she has been authorized to sign and file this application on behalf of United Steel, Paper And Forestry, Rubber, Manufacturing, Energy, Allied-Industrial And Service Workers International Union, Local 11-6.


SHERRIE A. SCHRODER

Subscribed and sworn to before me this 10th day of February, 2006.

My Commission Expires:


Notary Public



Certificate of Service

The undersigned hereby certifies that a copy of the foregoing has been mailed or electronically mailed to the following, this 10th day of February, 2006:

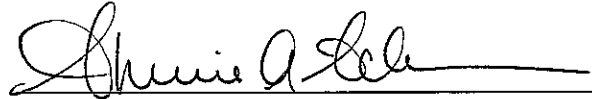
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A handwritten signature in black ink, appearing to read "Sherrill A. Cole", is written over a horizontal line.