

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

In the Matter of the Application of Southern            )  
Union Company d/b/a Missouri Gas Energy, The        )  
Laclede Group, Inc. and Laclede Gas Company        )  
for an Order Authorizing Sale, Transfer, and         ) Case No. GM-2013-0254  
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 IBEW LOCAL 53  
TO INTERVENE OUT OF TIME**

COMES NOW International Brotherhood of Electrical Workers, Local Union No. 53, (“Local 53”) by and through its counsel, Blake & Uhlig, P.A., and respectfully submits this Application to Intervene in this proceeding pursuant to 4 CSR 240-2.075. In support of this Application, the Petitioners state as follows:

1. This matter involves an application filed by Southern Union Company d/b/a Missouri Gas Energy (“MGE”) and Laclede Gas Company (“Laclede”) relating to the sale of Missouri assets of MGE to Laclede;
2. Pursuant to 4 CSR 240-2.075(10) the Commission is authorized to grant the instant motion after the February 13, 2013, intervention date.
3. Local 53 is a labor organization that represents call center employees employed by MGE. Local 53 has a collective bargaining agreements with MGE covering the terms and conditions of employment of those employees.
4. Local 53 is an unincorporated association doing business and representing employees in the State of Missouri. The names, addresses and telephone number of the Petitioner seeking leave to intervene is:

Bruce VanCompernelle  
IBEW Local Union No. 53  
1100 Admiral Boulevard  
Kansas City MO 64106  
(816) 421-5464

Counsel: Michael E. Amash  
Blake & Uhlig, P.A.  
753 State Avenue, Suite 475  
Kansas City, Kansas 66101  
Phone: (913) 321-8884  
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5. The Petitioners request that service be made to the Petitioners' counsel.
6. Local 53 does not have any pending actions or final unsatisfied judgment or decisions against it as contemplated by 4 CSR 240-2.060(1)(K).
7. Local 53 does not have any annual reports or assessment fees that are overdue.
8. Local 53 seeks permission to intervene in this matter pursuant to 4 CSR 240-2.075.
9. Local 53 is the exclusive collective bargaining representative of certain MGE non-managerial employees. Local 53 and the employees it represents may be affected by Orders entered by the Commission in this proceeding, and, accordingly, are interested parties in this proceeding.
10. Local 53 and the employees it represent have a direct interest in this proceeding which is different from that of the general public, all other labor organizations, Missouri Gas Energy Laclede, or any other party. Thus, the interests of Local 53 and the employees it represents cannot be adequately represented by any other party.

11. Specifically, where the public's interest here are concentrated in the safe and dependable delivery of power at a reasonable cost, Local 53 and the employees it represents are additionally concerned with the impact the proposed sale could have on jobs, wages, pensions and other terms and conditions of employment for those bargaining unit employees employed at the Kansas City, Missouri call center.

12. No other party to this proceeding can adequately represent the additional, legitimate concerns of Local 53 and the employees it represents.

13. Local 53 has no current position regarding the Application herein. However, to the extent that said Application may impact the employment status, wages, benefits, or other terms and conditions of employment of the employees represented by Local 53, Local 53 reserve the right to participate in the proceedings to the extent necessary to protect the interests of its members.

14. Local 53 hereby affirmatively accepts the record established in this case, including the requirements of any orders of the Commission, as of the date the instant Motion is filed.

15. No party to this matter will be adversely impacted or prejudiced by granting this Application to Intervene. Local 53 has acted as expeditiously as possible to submit the instant Application to Intervene upon learning of the instant filing with the Commission.

WHEREFORE, having stated its grounds for intervention, its position and interest in this proceeding, the International Brotherhood of Electrical Workers Local Union No. 53 respectfully requests that the Commission:

- A. Grant Local 53's leave to intervene in these proceedings on its behalf and on behalf of its members, and to be heard at such time as the Commission may fix; and
- B. In all respects be a party to this proceeding.

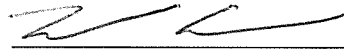
Respectfully submitted,

/s/ Michael E. Amash  
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ATTORNEY FOR IBEW LOCAL 53

**ATTORNEY VERIFICATION**

I, Michael Amash, being first duly sworn, do hereby certify, depose and state that I am the attorney of the IBEW Local Union No. 53 which seeks intervention in the above captioned proceeding before the Missouri Public Service Commission; that I have read the above and foregoing Application to Intervene and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant to intervene.

  
\_\_\_\_\_  
Michael Amash

Subscribed and sworn to before me this 27 day of February, 2013.

My Commission Expires:  
9-4-13

  
\_\_\_\_\_  
Notary Public



**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing *Application to Intervene* was served upon all parties to this action, by email and electronically filed using EFIS, this 27<sup>th</sup> day of February, 2013.

/s/ Michael E. Amash\_\_\_\_\_