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February 21, 2001

**By Hand Delivery**

The Honorable Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65101

**FILED<sup>2</sup>**  
FEB 22 2001 *mw*  
Missouri Public  
Service Commission

RE: Case No. GT-2001-329

Dear Judge Roberts:

Attached for filing in the above-referenced case are an original and fourteen (14) copies of the Application to Intervene of the Missouri Industrial Energy Consumers.

Thank you for your assistance in bringing this filing to the attention of the Commission. Please call me if you have any questions.

Very truly yours,

*Diana Vuyksteke*  
Diana M. Vuyksteke

DMV:dv  
Enclosures  
cc: All parties

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

**FILED<sup>2</sup>**  
FEB 22 2001  
Missouri Public  
Service Commission

In the matter of Laclede Gas Company's       )  
Tariff Filing to Implement an Experimental    )  
Fixed Price Plan and Other Modifications     )  
to Its Gas Supply Incentive Plan             )

Case No. GT-2001-329

**APPLICATION TO INTERVENE**

Comes now Adam's Mark Hotel, Alcoa Foil Products, Anheuser-Busch, The Boeing Company, Ford Motor Company, General Motors Corporation, Hussman Refrigeration, Mallinckrodt, Inc., MEMC Electronic Materials, Monsanto Company, Procter & Gamble Manufacturing, and Ralston Purina, hereafter referred to as the Missouri Industrial Energy Consumers ("MIEC"), and pursuant to 4 CSR 240-2.075 and 4 CSR 240-2.080, files its Application to Intervene. In support of its Application to Intervene, the MIEC states as follows:

1. The MIEC is a group of large industrial customers of Laclede Gas Company  
"Laclede" and the rates, terms and conditions of the group's natural gas service may  
be affected by the outcome of this case;
2. The MIEC's interest in this case is to avoid any adverse impact on the rates, terms  
and conditions of its natural gas service;
3. As large customers of Laclede, the MIEC's interest in this proceeding is different than  
that of the general public;
4. The MIEC does not yet have sufficient information to take a position regarding  
Laclede's filing, but reserves the right to take positions on all issues that may affect  
its members in this case.
5. Granting the MIEC's proposed intervention would serve the public interest by  
assisting the development of a more complete record for decision by the Commission.

WHEREFORE, the MIEC requests that the Commission grant its Application to Intervene herein and make it a party to this case for all purposes.

Respectfully submitted,

BRYAN CAVE, LLP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all counsel of record as shown on the Commission's official service list this 21<sup>st</sup> day of February, 2001.

*Diana Vuylstake*