

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

In the matter of Missouri Gas Energy's Tariffs)
to implement a General Rate Increase for) Case No. GR-2009-0355
Natural Gas Service.)

APPLICATION TO INTERVENE

COMES NOW the University of Missouri - Kansas City ("UMKC") and for its
Application to Intervene states:

1. UMKC is a political subdivision of the state and receives gas service and gas
transportation service from Missouri Gas Energy ("MGE").

2. Correspondence, communications, orders and decisions in this matter should be
addressed to:

Jeremiah D. Finnegan
FINNEGAN, CONRAD & PETERSON, LC
1209 Penntower Office Center
3100 Broadway
Kansas City, Missouri 64111

3. MGE is a division of Southern Union Company with its principal office and place
of business in Missouri located in Kansas City, Missouri. MGE is a gas corporation as defined
in Section 386.020, RSMo. Supp., and as such is subject to the jurisdiction, supervision and
control of the Commission for the distribution, transportation and sale of gas in certain portions
of the State of Missouri.

4. On April 2, 2009, MGE filed tariffs seeking an increase in rates to produce an
additional \$32.4 million.

5. Applicant is generally opposed to an increase in gas and transportation rates unless

justified as reasonable and lawful after notice and an opportunity to be heard. Applicant is also concerned that other parties to the case may propose an increase in such rates. In addition, UMKC pays MGE a substantial sum for gas service under the residential and small general service rates, which MGE is also proposing to increase.

6. The granting of the proposed intervention would serve the public interest and the Applicants are political subdivisions of the State of Missouri. Applicant has been granted intervenor status in several prior MGE rate cases and has been an active participant.

7. As the payers of multiple Customer Charges, the Applicants also have an interest in the proceeding different from that of the general public.

WHEREFORE, for the foregoing reasons, UMKC respectfully requests that the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, LC

By /s/ Jeremiah D. Finnegan
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ATTORNEY FOR APPLICANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application to Intervene was e-mailed or mailed, postage prepaid, this 27th day of April, 2009, to:

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/s/ Jeremiah D. Finnegan
Jeremiah D. Finnegan