

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

In the matter of the Application of Ozark Energy )  
Partners, LLC for a Certificate of Public Convenience )  
and Necessity to Construct and Operate an Intrastate ) Case No. GA-2006-0561  
Natural Gas Pipeline and Gas Utility to Serve Portions )  
of the Missouri Counties of Christian, Stone and Taney, )  
and for Establishment of Utility Rates. )

**APPLICATION TO INTERVENE**

COMES NOW Missouri Gas Energy (MGE), a division of Southern Union Company; by and through counsel, and for its application to intervene pursuant to 4 CSR 240-2.075, respectfully states as follows:

1. MGE is a division of Southern Union Company which is duly incorporated under the laws of the State of Delaware and conducts business in Missouri under the fictitious name of Missouri Gas Energy. MGE’s principal office and place of business is located at 3420 Broadway, Kansas City, Missouri 64111. A copy of a certificate from the Missouri Secretary of State that Southern Union Company is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GM-2003-0238 and is incorporated herein by reference. A copy of a certificate from the Missouri Secretary of State that Missouri Gas Energy is a registered fictitious name of Southern Union Company was submitted in Case No. GM-2003-0238 and is incorporated herein by reference. Other than cases that have been docketed at the Commission, MGE has no pending action or final unsatisfied judgments against it from any state or federal agency or court within the past three (3) years that involve customer service. MGE has a pending general rate case identified as Case No. GR-2006-0422. MGE has no annual report or assessment fees that are overdue. MGE currently conducts business as a “gas

corporation” and provides natural gas service to approximately 500,000 customers in the Missouri counties of Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Pettis, Platte, Ray, Saline, Stone, and Vernon, subject to the jurisdiction of the Missouri Public Service Commission as provided by law.

2. All correspondence, communications, orders and decisions in this matter should be addressed to the undersigned counsel and the following:

Michael R. Noack  
Director, Pricing and Regulatory Affairs  
Missouri Gas Energy  
3420 Broadway  
Kansas City, Missouri 64111  
816-360-5560  
Fax: 816-360-5536  
E-mail: [mike.noack@sug.com](mailto:mike.noack@sug.com)

3. The Commission established the above-referenced docket to consider the application of Ozark Energy Partners, LLC regarding the proposed construction of natural gas pipelines and the provision of natural gas service in portions of Christian, Stone, and Taney Counties in Missouri. The Commission has addressed similar applications, in June 1997 in Case No. GA-96-264, and in August of 1998 and 2000, in Case No. GA-98-227.

4. MGE was granted intervention and participated as a party in Cases Nos. GA-96-264 and GA-98-227.

5. MGE states that its interest in this proceeding is to protect the existing rights it has to provide service in areas that have already been certificated to it by the Commission. MGE opposes any attempt by the applicant to provide service in any areas where MGE is already authorized to provide service. MGE also utilizes the Southern Star Central Gas Pipeline (SSC)



Certificate of Service

I hereby certify that two, true and correct copies of the above and foregoing document was sent by electronic mail on this 24<sup>th</sup> day of July, 2006, to:

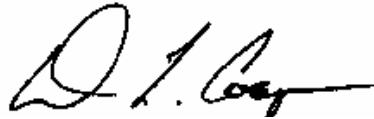
General Counsel  
Missouri Public Service Commission  
Governor Office Building  
P.O. Box 360  
Jefferson City, MO 65102  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)

The Office of the Public Counsel  
Governor Office Building, 6<sup>th</sup> Floor  
P.O. Box 2230  
Jefferson City, MO 65102-2230  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

William D. Steinmeier  
Mary Ann (Garr) Young  
William D. Steinmeier, P.C.  
2031 Tower Drive  
P.O. Box 104595  
Jefferson City, MO 65110-4595  
[wds@wdspsc.com](mailto:wds@wdspsc.com)

Paul S. DeFord  
Suite 2800  
2345 Grand Boulevard  
Kansas City, MO 64108-2612  
[pdeford@lathropgage.com](mailto:pdeford@lathropgage.com)

James M. Fischer  
Fischer & Dority, P.C.  
101 Madison, Suite 400  
Jefferson City, MO 65101  
[jfischerpc@aol.com](mailto:jfischerpc@aol.com)



---

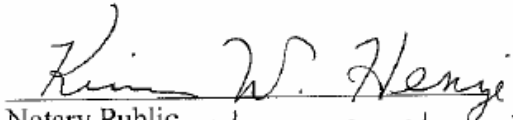
**VERIFICATION**

STATE OF MISSOURI     )  
                                  )  
COUNTY OF JACKSON    )     SS

I, Michael R. Noack, state that I am employed by Missouri Gas Energy (MGE), a Division of Southern Union Company as Director of Pricing and Regulatory Affairs; that I have read the attached document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of MGE.

  
**Michael R. Noack**

Subscribed and sworn to before me this 24th day of July, 2006.

  
Notary Public   Kim W. Henzi

My Commission Expires:

Feb. 3, 2007

