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ATTORNEYS AT LAW

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April 11, 2003

ORIGINAL

Missouri Public Service Commission  
Attn: Secretary of the Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Mo. 65102-0360

FILED<sup>3</sup>

APR 11 2003

RE: Case No. GR-2003-0330

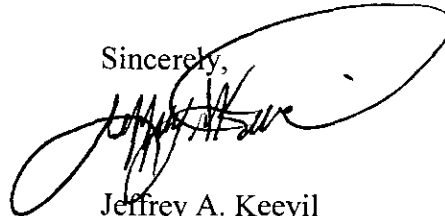
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case is an original and the appropriate number of copies of an APPLICATION FOR INTERVENTION on behalf of Enbridge Pipelines (KPC).

Copies of this filing have on this date been mailed or hand-delivered to counsel for parties of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er  
Enclosures  
Cc: counsel of record

APR 11 2003

Missouri Public  
Service Commission

the case has been opened fairly recently, the Commission has not yet issued its order giving formal notice of the case and setting an intervention date, and under normal Commission procedure the case would not be the subject of Staff review until the conclusion of the 2002-2003 ACA period. While KPC does not currently have sufficient information to take a position herein, KPC is concerned that decisions or orders of the Commission herein could adversely impact it.

3. Because KPC may be directly and adversely affected by the Commission's decisions and orders in this case, KPC has a direct interest in this proceeding which is different from that of the general public, and which cannot be adequately represented by any other party. Furthermore, granting the proposed intervention will serve the public interest by allowing the input of one of MGE's material transporters to be brought before the Commission. Accordingly, KPC submits that it meets the criteria for intervention set forth in 4 CSR 240-2.075 and that this Application For Intervention should be granted. Furthermore, the Commission has previously recognized the standing of KPC and its predecessors to intervene in these proceedings by granting intervention to KPC and/or its predecessors in numerous ACA proceedings involving MGE and/or its predecessor (*i.e.*, GR-93-140, GR-94-101, GR-94-228, GR-95-82, GR-96-78, GR-96-450, GR-98-167, GR-99-304, GR-2000-425, GR-2001-382 and GR-2002-348).

4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

Jeffrey A. Keevil  
Stewart & Keevil, L.L.C.  
Cherry Street Centre  
1001 Cherry Street, Suite 302  
Columbia, Missouri 65201  
(573) 499-0635

Chris Kaitson  
Associate General Counsel  
Enbridge Pipelines (KPC)  
1100 Louisiana, Ste. 3300  
Houston, Texas 77002  
(713) 650-8900

(573) 499-0638 (fax)

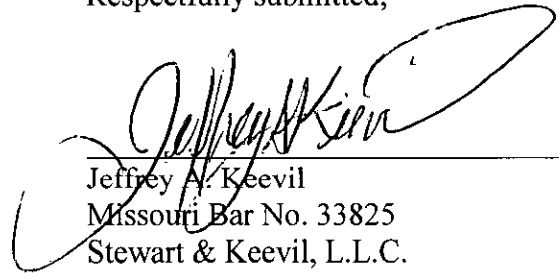
(713) 821-2229 (fax)

with a copy to the following:

Don Whittington  
Kansas Pipeline Company  
Manager of Regulatory Affairs  
1100 Louisiana, Ste. 2900  
Houston, Texas 77002

WHEREFORE, having stated its grounds for intervention, KPC requests the Commission issue its Order granting it leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,



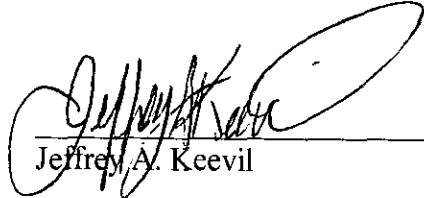
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ATTORNEY FOR ENBRIDGE  
PIPELINES (KPC)


VERIFICATION

STATE OF MISSOURI     )  
                                      )  
COUNTY OF BOONE     )     ss

I, Jeffrey A. Keevil, being first duly sworn verify that I: am an attorney for Enbridge Pipelines (KPC) (hereafter "KPC"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing on behalf of KPC; and that the foregoing is correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Jeffrey A. Keevil

Subscribed and sworn to before me this 11 day of April, 2003.  
**Shawna M. Schulte**  
Notary Public   Notary Seal  
STATE OF MISSOURI  
Boone County  
My Commission Expires: Jan. 13, 2004

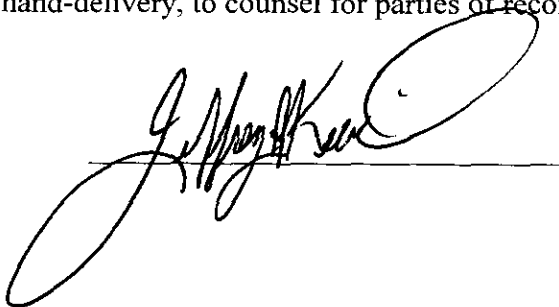
  
\_\_\_\_\_  
Notary Public

My Commission expires: January 13, 2004



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to counsel for parties of record on this 11th day of April, 2003.

  
\_\_\_\_\_