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April 11, 2003

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

RE: Case No. GR-2003-0330

Missouri Public Service Commission

APR 1 1 2003

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.

Sincere Jeffrey A. Keevil

JAK/er Enclosures Cc: counsel of record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

APR 1 1 2003

FILED

Missouri Public Service Commission

In the Matter of Missouri Gas Energy's Purchased Gas Adjustment Factors to be Audited in Its 2002-2003 Actual Cost Adjustment.

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Case No. GR-2003-0330

APPLICATION FOR INTERVENTION

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COMES NOW Enbridge Pipelines (KPC), formerly known as Kansas Pipeline Company, ("KPC") and in accordance with 4 CSR 240-2.075, applies to intervene and become a party in the above-referenced case and, in support of this Application For Intervention, respectfully states as follows:

1. KPC, a Kansas General Partnership, is a FERC-jurisdictional supplier of natural gas transportation service in the State of Missouri (Kansas City, Missouri metro area) to Missouri Gas Energy ("MGE"), a division of Southern Union Company ("Southern Union"). KPC began supplying such service to MGE on or about June 1, 1998.

2. KPC has a direct interest in this proceeding as a supplier of natural gas transportation service to MGE, since Staff may assert that some of the costs associated therewith may be subject to review in this case. As such, KPC has an interest in this proceeding which is different from that of the general public. No other party to this proceeding can adequately represent the interests of KPC. Further, the granting of the intervention of KPC will in no way hinder or delay the timely completion of this case, as

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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.

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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

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(573) 499-0638 (fax)

(713) 821-2229 (fax)

with a copy to the following:

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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,

Jeffrey A: Keevil Missouri Bar No. 33825 Stewart & Keevil, L.L.C. 1001 Cherry Street, Suite 302 Columbia, Missouri 65201 (573) 499-0635 (573) 499-0638 (fax) <u>per594@aol.com</u> ATTORNEY FOR ENBRIDGE PIPELINES (KPC)

VERIFICATION

STATE OF MISSOURI)) ss COUNTY OF BOONE)

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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.

Subscribed and sworn to before me this _____ day of April 2003. Notary Public Notary Seal STATE OF MISSOURI **Boone County** Notary Public My Commission Expires: Jan. 13, 2004 My Commission expires: Jonuan **<u>CERTIFICATE OF SERVICE</u>**

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 ______ day of April, 2003.