

ORIGINAL

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March 25, 2003

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>**

**MAR 25 2003**

RE: Case No. GM-2003-0238

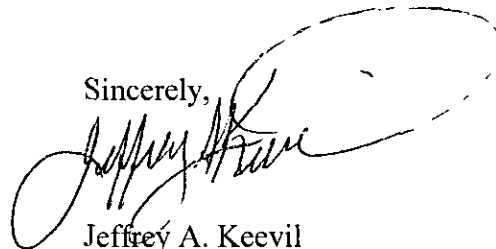
**Missouri Public  
Service Commission**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case is an original and the appropriate number of copies of a MOTION FOR LEAVE TO WITHDRAW AS A PARTY 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

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

**FILED<sup>3</sup>**  
MAR 25 2003

**Missouri Public  
Service Commission**

In the Matter of the Application of Southern )  
Union Company d/b/a Missouri Gas Energy )  
for Authority to Acquire Directly or )  
Indirectly, Up to and Including One Hundred )  
Percent (100%) of the Equity Interests of )  
Panhandle Eastern Pipeline Company, )  
Including its Subsidiaries, and to Take All )  
Other Actions Reasonably Necessary to )  
Effectuate Said Transaction. )

Case No. GM-2003-0238

**MOTION FOR LEAVE TO WITHDRAW AS A PARTY**

COMES NOW Enbridge Pipelines (KPC) (hereinafter "Enbridge") and applies for leave to withdraw as a party in the above-referenced case and, in support thereof, respectfully states as follows:

1. On January 23, 2003, Enbridge filed its Application for Intervention in this proceeding which was subsequently granted. Enbridge, a supplier of natural gas transportation service to Southern Union Company, had a real and legitimate interest in this proceeding given that by this proceeding Southern Union Company is seeking to acquire another of its suppliers of natural gas transportation service, which Enbridge believed could have a direct, negative effect on Enbridge. However, given the progress and current posture of this case, Enbridge no longer has an interest in this case sufficient to justify its continued allocation of resources to this matter<sup>1</sup>.

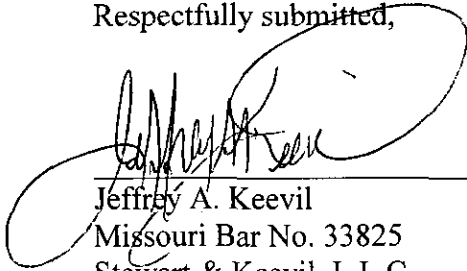
2. The public interest would not be compromised by the withdrawal of Enbridge as a party, and the other parties to the proceeding, having been informed of the intention of Enbridge to withdraw have indicated no objection thereto.

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<sup>1</sup> As a courtesy, Enbridge hereby informs the Commission that it does not intend to appear at the hearing in this matter for the reasons set forth above.

WHEREFORE, Enbridge Pipelines (KPC) requests the Commission issue an order granting its withdrawal as a party to this case.

Respectfully submitted,



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ATTORNEY FOR ENBRIDGE  
PIPELINES (KPC)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served on counsel for parties of record pursuant to the Commission's rule on Methods of Service, 4 CSR 240-2.080(17), on this 25th day of March, 2003.

