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June 7, 2001

Mr. Dale H. Roberts  
Secretary/Chief Regulatory Law Judge  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**FILED<sup>2</sup>**  
JUN 7 2001 *rh*  
Missouri Public  
Service Commission

**Re: Gateway Pipeline Company  
Case No. GM-2001-585**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Request for Hearing**. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

M. Ruth O'Neill  
Assistant Public Counsel

MRO:jb

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JUN 7 2001

In the Matter of the Joint Application )  
of Gateway Pipeline Company, Inc., Missouri )  
Gas Company and Missouri Pipeline Company )  
and the Acquisition by Gateway Pipeline )  
Company of the Outstanding Shares of )  
UtiliCorp Pipeline Systems, Inc. )

Missouri Public  
Service Commission

Case No. GM-2001-585

**REQUEST FOR HEARING**

COMES NOW, the Office of the Public Counsel (Public Counsel), and respectfully requests that this matter be set for evidentiary hearing before the Commission. This request is made in order to allow the Missouri Public Service Commission (Commission) to determine whether the proposed transaction is detrimental to the public interest, pursuant to by 4 CSR 240-2.060.7(D).

Public Counsel further requests that this matter be set for an early pre-hearing conference, in order to adopt at proposed procedural schedule and to allow the parties address issues regarding the proposed transaction, including discovery and possible alternative resolutions of this matter. Public Counsel respectfully suggests that the Commission set the early pre-hearing conference for June 28, 2001. In making this request for hearing, Public Counsel is aware of the Applicants' request for expedited treatment of this matter, and anticipates that the parties will take such request into consideration at the time a proposed procedural schedule is filed in this matter.

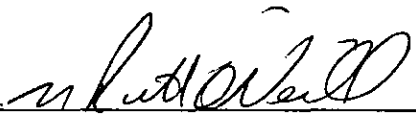
At this time, Public Counsel is not requesting that local public hearings be held. However, Public Counsel reserves the right to request local public hearings if it appears such hearings will be necessary or helpful to the Commission's fair and reasonable resolution of this matter.

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WHEREFORE, it is respectfully requested that the Commission grant the request for hearing and set this matter for early pre-hearing conference on or about June 28, 2001.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:   
M. Ruth O'Neill (#49456)  
Assistant Public Counsel

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## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 7<sup>th</sup> day of June 2001:

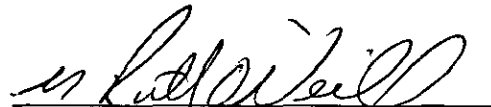
James C. Swearngen  
Paul A. Boudreau for UtiliCorp United  
Brydon, Swearngen & England PC  
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Mr. Thomas M. Byrne  
Ameren Services Company  
1901 Chouteau Avenue  
P O Box 66149 (MC 1310)  
St. Louis, MO 63166-6149

Jeffrey Keevil  
for Gateway Pipeline Company, Inc.  
Stewart & Keevil  
1001 Cherry Street, Suite 302  
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Ms. Lera L. Shemwell  
Cliff Snodgrass  
Missouri Public Service Commission  
P O Box 360  
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Mr. Michael C. Pendergast  
Laclede Gas Company  
720 Olive Street  
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St. Louis, MO 63101

A handwritten signature in dark ink, appearing to read "Jeffrey Keevil", is written over a horizontal line.