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

In the matter of Missouri Gas Energy's Tariffs to implement a General Rate Increase for Natural Gas Service.

Case No. GR-2006-0422

## **APPLICATION TO INTERVENE**

COMES NOW Central Missouri State University ("CMSU") and for its Application to

)

)

)

Intervene states:

1. CMSU is a political subdivision of the state and receives gas service and gas

transportation service from Missouri Gas Energy ("MGE").

2. Correspondence, communications, orders and decisions in this matter should be addressed to:

Jeremiah D. Finnegan FINNEGAN, CONRAD & PETERSON, LC 1209 Penntower Office Center 3100 Broadway Kansas City, Missouri 64111

3. MGE is a division of Southern Union Company with its principal office and place of business in Missouri located in Kansas City, Missouri. MGE is a gas corporation as defined in Section 386.020, RSMo. Supp., and as such is subject to the jurisdiction, supervision and control of the Commission for the distribution, transportation and sale of gas in certain portions of the State of Missouri.

4. On May 2, 2006, MGE filed tariffs seeking an increase in rates to produce an additional \$41.6 million.

5. Applicant is generally opposed to an increase in gas and transportation rates unless

66702.1

justified as reasonable and lawful after notice and an opportunity to be heard. While MGE does not appear to seek an increase in gas transportation rates, Applicant is concerned that other parties to the case may propose an increase in such rates. In addition, CMSU pays MGE a substantial sum for gas service under the residential and small general service rates, which MGE is proposing to increase.

6. The granting of the proposed intervention would serve the public interest and the Applicants are political subdivisions of the State of Missouri. Applicant has been granted intervenor status in several prior MGE rate cases and has been an active participant.

7. As the payers of multiple Customer Charges, the Applicants also have an interest in the proceeding different from that of the general public.

WHEREFORE, for the foregoing reasons, CMSU respectfully requests that the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, LC

By <u>/s/ Jeremiah D. Finnegan</u> JEREMIAH D. FINNEGAN, #18416 1209 Penntower Building 3100 Broadway Kansas City, Missouri 64111 (816) 753-1122 (816) 756-0373 Facsimile jfinnegan@fcplaw.com

ATTORNEY FOR APPLICANT

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Application to Intervene was e-mailed or mailed, postage prepaid, this 1st day of June, 2006, to:

Mr. James C. Swearengen Brydon, Swearengen & England, P.C. 312 East Capitol Avenue P.O. Box 456 Jefferson City, Missouri 65102-0456

Mr. Lewis Mills, Esq. Office of the Public Counsel P.O. Box 2230 Jefferson City, Missouri 65102

> <u>/s/ Jeremiah D. Finnegan</u> Jeremiah D. Finnegan