FINNEGAN, CONRAD & PETERSON, LC.

ATTORNEYS AND COUNSELORS AT LAW

1209 PENNTOWER OFFICE CENTER 3100 BROADWAX KANSAS CITY, MISSOURI 64111

> (610) 753-1122 Telecopter (810) 756-0373

November 26, 2003

JÉREMIAH FINNEGAN, P.C.

STUART W. CONRAD C. EDWARD PBTERSON®

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Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison, P.O. Box 360 Jefferson City, MO 65102

Case No. GR-2004-0209

Missouri Gas Energy Rate Case

FILED NOV 2 6 2003

Service Commission

Dear Judge Roberts:

Re:

Enclosed for filing find an original and nine copies of an Application to Intervene on behalf of the University of Missouri - Kansas City, Central Missouri State University and Jackson County, Missouri.

Also enclosed is a self-addressed and stamped envelope for you to return the extra copy with the file stamp thereon.

If you have any questions regarding this filing, please contact me.

Very truly yours,

FINNEGAN, CONRAD & PETERSON, L.C. By eremio eremiah D. Finnegan

JDF:crb

Enclosures

cc: John Coffman, Office of Public Counsel James C. Swearengen Hon. Katheryn Shields Jay Haden Judith Siminoe Ralph Krieger

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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Missouri Public Service Commission

NOV 2 6 2003

FILED

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

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Case No. GR-2004-0209

APPLICATION TO INTERVENE

COMES NOW the University of Missouri - Kansas City ("UMKC"), Central Missouri State University ("CMSU"), and Jackson County, Missouri ("Jackson County") pursuant to 4 C.S.R. 240-2.075 of the Rules of Practice and Procedure, and for their Application to Intervene state:

1. UMKC is a political subdivision of the state and receives gas service and gas transportation service from Missouri Gas Energy ("MGE").

2. CMSU is a political subdivision of the state and receives gas service and gas transportation service from Missouri Gas Energy ("MGE").

3. Jackson County is a political subdivision of the state and receives gas service and gas transportation service from Missouri Gas Energy ("MGE"). Jackson County's residents and businesses are served by MGE.

4. 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

5. MGE is a division of Southern Union Company with its principal office and place

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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.

6. On November 4, 2003, MGE filed tariffs seeking an increase in gas and transportation rates including the rates paid by UMKC, CMSU, Jackson County and Jackson County's residents and businesses.

7. Applicants are generally opposed to an increase in gas and transportation rates unless justified as reasonable and lawful after notice and an opportunity to be heard. In addition, Jackson County is generally opposed to an increase in gas and transportation rates for its citizens and businesses unless justified as reasonable and lawful after notice and an opportunity to be heard.

8. The granting of the proposed intervention would serve the public interest and the Applicants are political subdivisions of the State of Missouri.

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

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WHEREFORE, for the foregoing reasons, UMKC, CMSU and Jackson County respectfully requests that the Commission grant their Application to Intervene in this matter.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, LC

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JEREMIAH D. FINNEGAN, #18416 1209 Penntower Building 3100 Broadway Kansas City, Missouri 64111 (816) 753-1122 (816) 756-0373 Facsimile

ATTORNEY FOR APPLICANTS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application to Intervene was mailed, postage prepaid, this 26th day of November, 2003, to:

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

Mr. John Coffman, Esq. Office of the Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

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