

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

In the Matter of MoGas Pipeline LLC) Case No. GC-2011-0138

APPLICATION TO INTERVENE

COMES NOW the Municipal Gas Commission of Missouri (“MGCM”), pursuant to 4 CSR 240-2.075, and for its Application to Intervene in this case states as follows:

1. MGCM is a statewide municipal joint action agency specifically authorized by Missouri law (Section 393.700 et. seq., RSMo) to operate as a gas utility for the benefit of the combined requirements of its members. The MGCM currently has 14 Missouri municipal natural gas systems as members ranging from approximately 200 to over 74,000 meters. These municipal natural gas systems serve over 82,000 retail customers in the state. The Cities of Richland, St. James, St. Roberts and Waynesville, Missouri, entities participating in and supplied natural gas by MGCM, all own and operate municipal gas systems that are captive customers of MoGas Pipeline, LLC (“MoGas”).

2. Correspondence or communications regarding this application, including service of all notices and orders of this Commission should be addressed to:

David L. Woodsmall
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3. MGCM is a governmental entity that purchases natural gas and arranges for its transportation on behalf of its municipal members. As part of these responsibilities

and as it applies to this particular case, MGCM has arranged for the transportation of natural gas over the MoGas system for the municipalities of Richland, St. James, St. Roberts and Waynesville.

4. Furthermore, MGCM has a direct interest in this case as it is currently involved in litigation against MoGas to seek recovery of overcharges made by MoGas under the former tariffs which MoGas now seeks to have declared unlawful through its collateral attack of the Revised Report and Order issued by this Commission in Case No. GC-2006-0491. As such, MGCM has an interest different from that of the general public and which may be adversely affected by a final order arising from this case.

5. At this time, MGCM opposes the relief sought by MoGas in its Application and Complaint.

WHEREFORE, for the reasons stated herein, MGCM respectfully requests that the Commission grant its Application to Intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,



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**Attorneys for the Municipal Gas
Commission of Missouri**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the forgoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", written in a cursive style.

David L. Woodsmall

Dated: December 2, 2010