

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

In the Matter of the Application of Missouri Gas)
Utility, Inc., for a certificate of convenience and)
necessity authorizing it to construct, install, own,)
operate, control, manage and maintain a natural)
gas transmission line and a distribution system to)
provide gas service in Greene, Polk, and Dallas)
Counties, Missouri as a new certificated area.)

Case No. GA-2010-0189

APPLICATION TO INTERVENE OF MISSOURI GAS ENERGY

COMES NOW Missouri Gas Energy ("MGE"), an operating division of Southern Union Company ("Southern Union"), by counsel, pursuant to 4 CSR 240-2.075, and for its application to intervene in the above-captioned proceeding states as follows to the Missouri Public Service Commission (the "Commission"):

1. Southern Union is a Delaware corporation and conducts business in Missouri through its MGE operating division. Through MGE, Southern Union is a "gas corporation" and "public utility" as those terms are defined in Section 386.020 RSMo and as such is subject to jurisdiction of the Commission as provided by law.
2. MGE's principal Missouri office is located at 3420 Broadway, Kansas City, Missouri 64111.
3. Communications relating to this application and proceeding should be directed to the undersigned counsel as well as to:

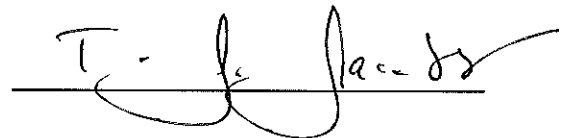
Michael R. Noack
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4. On December 22, 2008 Missouri Gas Utility, Inc. ("MGU") filed its application which is the subject of the above-captioned case. By its application, MGU proposes to install a natural gas distribution system to provide sales and transportation service in Bolivar and Buffalo, Missouri. To provide this service, MGU seeks an area certificate as well as a line certificate.
5. By the Commission's Corrected Notice and Order issued December 28, 2009, the Commission established an intervention deadline of January 12, 2010.
6. MGE should be allowed to intervene in this proceeding because it has an interest that is different from that of the "general public" which may be adversely affected by a final order in this case. According to the application, the area for which MGU seeks a line certificate runs adjacent to the present service territory of MGE. Additionally, the application states that a proposed pipeline will cross MGE's natural gas distribution lines. MGE is still analyzing the impact of the proposals outlined in the application as well as any other potential conflicts with its service territory and facilities.

WHEREFORE, for the reasons stated herein, MGE respectfully requests that the Commission issue an order permitting it to intervene in this case with full rights as a party hereto.

Respectfully submitted,

MISSOURI GAS ENERGY

A handwritten signature in black ink, appearing to read "T. J. Jacobs", is written over a horizontal line.

Todd J. Jacobs Mo. Bar # 52366
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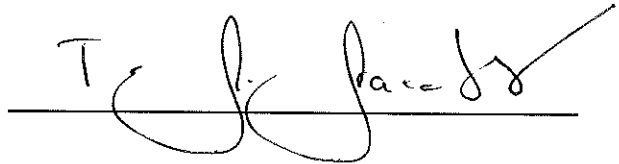
ATTORNEY FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, mailed by U.S. mail, or electronically transmitted on this 12th day of January, 2010, to the following:

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Executive Vice President and Chief Operating Officer Missouri Gas Utility, Inc.
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A handwritten signature in black ink, appearing to read "Todd J. Jacobs", is written over a horizontal line. The signature is stylized with a large initial "T" and a checkmark-like flourish at the end.

Todd J. Jacobs Mo. Bar # 52366