

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

In the Matter of the Joint Application of Southern)
Missouri Gas Company, L.P., d/b/a Southern Missouri)
Natural Gas and Missouri Gas Utility, Inc., for Approval) **File No. GM-2011-0354**
of the Merger of Southern Missouri Natural Gas with)
Missouri Gas Utility, Inc., and for Certain Related)
Transactions)

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:

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4. On April 27, 2011, Southern Missouri Gas Company, L.P., d/b/a Southern Missouri Natural Gas ("SMNG") and Missouri Gas Utility ("MGU") filed an application that requests,

among other things, authority from the Commission for SMNG and MGU to merge, with MGU as the surviving entity.

5. By the Commission's Order issued April 28, 2011, the Commission established an intervention deadline of May 18, 2011.

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. MGU's current operating area runs adjacent to the certain areas of MGE's service territory. Additionally, as noted in Case No. GA-2010-0189, certain MGU's pipelines cross MGE's natural gas distribution lines.

7. MGE and MGU entered a Stipulation and Agreement in GA-2010-0189 to address certain operating issues due to the proximity of service territories and similarity of names between the two utilities. MGE wants to ensure that similar operational issues are addressed with the surviving entity of the proposed merger. MGE also wants to address any other issues that that may be of concern to MGE during the course of discovery in the present case. MGE is still analyzing the present case to determine what, if any impact there may be with respect to operational or other issues.

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,

/s/

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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 18th day of May, 2011 to the following:

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Todd J. Jacobs