

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

In the Matter of)
Kansas City Power & Light Company’s)
Request for Authority to Implement) File No. ER-2012-0174
A General Rate Increase for Electric Service)

and

In the Matter of)
KCP&L Greater Missouri Operations Company’s)
Request for Authority to Implement) File No. ER-2012-0175
General Rate Increase for Electric Service)

SOUTHERN UNION COMPANY’S APPLICATION FOR LEAVE TO INTERVENE

COMES NOW Southern Union Company (“Southern Union”) d/b/a Missouri Gas Energy (“MGE”), by and through counsel, pursuant to 4 CSR 240-2.075, and for its application for leave to intervene in the above-captioned proceedings, respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. Southern Union is a Delaware corporation and conducts business in Missouri through the fictitious name Missouri Gas Energy. Through MGE, Southern Union is a “gas corporation” and “public utility” as those terms are defined in RSMo. §386.020, 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. Other than cases that have been docketed at the Commission, MGE has no pending action or final unsatisfied judgments against it from any state or federal agency or court within the past three years that involve customer service. MGE has no annual report or assessment fees that are overdue.

4. Communications relating to this application and proceeding should be directed to the undersigned counsel and the following:

Michael R. Noack
Director, Pricing and Regulatory Affairs
Missouri Gas Energy
3420 Broadway
Kansas City, Missouri 64111
816-360-5560
Fax: 816-360-5536
E-mail: mike.noack@sug.com

5. On February 27, 2012, Kansas City Power & Light Company (“KCPL”) and KCP&L Greater Missouri Operations Company (“GMO”) filed tariffs seeking revenue increases

6. By the Commission’s Order Suspending Tariff, Setting Pre-Hearing Conference, and Directing Filings; and Notice of Contested Case and Hearings issued February 28, 2012, the Commission directed that applications to intervene be filed by March 19, 2012.

7. MGE’s application is one day out of time. Commission Rule 4 CSR 240-2.075(10) states that “Motions to intervene . . . filed after the intervention date may be granted upon a showing of good cause. Any motion so filed must include a definitive statement whether or not the entity seeking intervention . . . accepts the record established in that case, including the requirements of any orders of the commission, as of the date the motion is filed.”

8. As the Commission may be aware, MGE counsel have been engaged in matters concerning the proposed acquisition of Southern Union Company by Energy Transfer Equity, L.P. (Commission File No. GM-2011-0412). In the press of that transaction, MGE overlooked the intervention deadline and neglected to make provision for this application for intervention.

9. MGE asks that the Commission find that good cause exists to grant MGE leave to seek intervention one day out time. MGE further states that it will accept the record established

in this case, including the requirements of any order of the Commission, as of the date of this filing.

10. MGE should be allowed to intervene in this proceeding, because MGE has an interest that is different from that of the “general public” that may be adversely affected by a final order in this case and because granting intervention to MGE would serve the public interest. As a provider of natural gas service in a territory which substantially overlaps the territory in which KCPL and GMO provide electric service, MGE’s services and demand-side efforts are interrelated with those of KCPL and GMO. Consequently, MGE’s interest in this proceeding relates primarily to issues in the areas of class cost-of-service, rate design, demand-side management and rules of service. MGE’s status as a Missouri public utility and MGE’s direct specific interests in the subjects of this proceeding indicate that its intervention would serve the public interest.

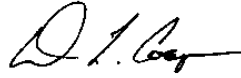
11. MGE has been a party to KCPL’s last three rate cases, Commission Case Nos. ER-2006-0314, ER-2007-0291, ER-2009-0089 and ER-2010-0355.

12. MGE does not yet know what issues will arise in this proceeding and, as such, cannot yet state precisely its position. A detailed statement of position and identification of issues with respect to these cases may be submitted by MGE in accordance with the procedural schedule.

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

hereto.

Respectfully submitted,



Dean L. Cooper MBE #36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
Phone: (573) 635-7166
Fax: (573) 634-3847
dcooper@brydonlaw.com

Todd J. Jacobs MBE #52366
Senior Attorney
[Missouri Gas Energy](http://MissouriGasEnergy.com)
3420 Broadway
Kansas City, MO 64111
816-360-5976
816-360-5903 (fax)
Todd.Jacobs@sug.com

ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 20th day of March, 2012, to:

Sarah Kliethermes
Missouri Public Service Commission
Governor's Office Building
200 Madison Street
P.O. Box 360
Jefferson City, Missouri 65102
sarah.kliethermes@psc.mo.gov

Lewis Mills
Governor's Office Building
200 Madison Street
P.O. Box 7800
Jefferson City, Missouri 65102
lewis.mills@ded.mo.gov

Stuart Conrad
Jeremiah Finnegan
Finnegan, Conrad & Peterson, LC
3100 Broadway, Suite 1209
Kansas City, MO 64111
stucon@fcplaw.com
jfinnegan@fcplaw.com

Jessica Blome
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
jessica.blome@ago.mo.gov

Diana M. Vuylsteke
Bryan Cave
211 N. Broadway, Suite 3600
St. Louis MO 63102
dmvuylsteke@bryancave.com

Thomas M. Byrne
Ameren Services Company
1901 Chouteau Ave.
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
tbyrne@ameren.com

Karl Zobrist
Sonnenschein Nath &
Rosenthal LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
kzobrist@sonnenschein.com

Carl J. Lumley
Curtis, Heinz, Garrett & O'Keefe, P.C.
clumley@lawfirmemail.com

James B. Lowery
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
lowery@smithlewis.com

Arthur Perry Bruder
United States Department of Energy
1000 Independence Avenue SW
Washington, DC 20085
Arthur.Bruder@hq.doe.gov

David L. Woodsmall, Esq.
WOODSMALL LAW OFFICE
807 Winston Court
Jefferson City, Missouri 65101
david.woodsmall@woodsmalllaw.com

Mark Comley
Newman, Comley & Ruth P.C.
P.O. Box 537
Jefferson City, MO 65102
comleym@ncrpc.com

James M. Fischer
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101
jfischerpc@aol.com

Mary Ann Young
Division of Energy
DNREnergyCases@dnr.mo.gov

Henry B. Robertson
Great Rivers Environmental Law Center
705 Olive Street, Suite 614
St. Louis, Missouri 63101
hrobertson@greatriverslaw.org

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
john@johncoffman.net



VERIFICATION

STATE OF Missouri)
COUNTY OF Jackson) ss

I, Todd J. Jacobs, state that I am employed by Missouri Gas Energy (MGE), a division of Southern Union Company, as Senior Attorney; that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and that I am authorized to make this statement on behalf of MGE.



Subscribed and sworn to before me this 20th day of March, 2012.

Karen Hotchkiss
Notary Public

My Commission Expires:

10/5/13

