

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

<b>In the Matter of Union Electric Company</b>	)	
<b>d/b/a AmerenUE for Authority to File Tariffs</b>	)	<b>Case No. GR-2010-0363</b>
<b>Increasing Rates for Natural Gas Service</b>	)	
<b>Provided to Customers in the Company's</b>	)	
<b>Missouri Service Area.</b>	)	

**MoGAS PIPELINE LLC's RESPONSE TO AMERENUE'S OPPOSITION TO  
ITS APPLICATION TO INTERVENE**

Comes now MoGas Pipeline LLC ("MoGas"), by and through its counsel, and in response to AmerenUE's Suggestions in Opposition to MoGas' Application to Intervene filed on July 12, 2010, states:

1. AmerenUE objects that MoGas has not stated (a) a sufficient reason or "interest" under Rule 240.2.075(2) for intervening in this case, and (b) that MoGas has not shown that it has an interest different from that of the general public which may be adversely affected by a final order (Rule 240-2.075(4), or (c) that MoGas has not stated that its intervention would serve the public interest.

2. MoGas has stated that AmerenUE is a shipper of natural gas on its pipeline system. Further, MoGas has cited to the Direct Testimony of AmerenUE's witness, Emma N. Cruthis filed in this case on June 11, 2010. In her Direct Testimony Ms. Cruthis makes numerous specific references to MoGas, MoGas' FERC tariffs, MoGas' certificate case at FERC (Case CP06-407-408-409), MoGas' Application to FERC for authority to construct a Compressor Station in Curryville, Missouri (Case CP07-450) and MoGas' most recent FERC Rate Case (Case RP09-791). (Direct Testimony of Emma N. Cruthis, pp. 3-6). MoGas respectfully suggests that Ms. Cruthis' Direct Testimony regarding MoGas' cases before FERC clearly establishes that MoGas has an interest in this case and that its interests may well be

different than the general public. At this time MoGas does not know how its interest may be adversely affected, directly or collaterally, by a final order in this case. MoGas seeks intervention to insure that its interests will not be adversely affected.

3. Intervention in this case will serve the public interest because it will allow MoGas to ensure that the Commission is correctly informed on all aspects of the FERC filings and orders that AmerenUE has referenced in its Direct Testimony and which may come up in further testimony in this case before the Commission.

4. Ameren UE suggests (page 2, paragraph 4 Response in Opposition) that MoGas may use its intervention in this case "...in an attempt to gain leverage" in a pending lawsuit with Ameren arising out of the Commission's final order in GC-2006-0491. MoGas objects to AmerenUE's speculative suggestion and specifically denies any such intention.

WHEREFORE, MoGas respectfully requests that its Application to Intervene be granted.

Respectfully submitted,

CURTIS, HEINZ  
GARRETT & O'KEEFE, P.C.

/s/ Leland B. Curtis

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**CERTIFICATE OF MAILING**

A true and correct copy of the foregoing was emailed or faxed this 16th day of July, 2010, to:

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