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TO FREDERICKTOWN

MEMBER MISSOURI AND ILLINOIS BAR

J.B. SCHNAPP (1920-1994) JOHN W. REID, II (1940-1991)

November 16, 1999

Mr. Dale Hardy Roberts Secretary, Missouri Public Service Commission P.O. Box 360

Jefferson City, Missouri 65102

RE: Joint Application of Atmos Energy Corporation and Arkansas Western Gas Company Case No. GM-2000-312

FILED

NOV 1 8 1999

Missouri Public Service Commission

Dear Mr. Roberts:

an original and fourteen copies Enclosed please find "Application to Intervene" for filing on behalf of Noranda Aluminum, Inc.

I have this date served a copy of same upon Mr. Duffy, Mr. Fischer and the Office of Public Counsel.

Robin E. Fulton

REF:plw Enclosures

cc: Mr. Gary W. Duffy

Mr. James M. Fischer

Office of the Public Counsel

Mr. George Swogger

w/encl.

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
NOV 1 8 1999

In the Matter of the Joint Application
of Atmos Energy Corporation and Arkansas
Western Gas Company, d/b/a Associated
Natural Gas Company, for an Order
Authorizing the Sale and Transfer of
Certain Assets of Associated Natural
Gas Company Located in Missouri to Atmos
Energy Coroporation and Either Authorizing
the Transfer of Existing Certificates of
Public Convenience and Necessity or
Granting a New Certificate of Public
Convenience and Necessity to Atmos Energy
Corporation in Conjunction with Same.

Missouri Public Service Commission

) Case No. GM-2000-312

APPLICATION FOR INTERVENTION

Comes now NORANDA ALUMINUM, INC., a corporation, (hereinafter referred to as "INTERVENOR"), by counsel Robin E. Fulton of SCHNAPP, FULTON, FALL, SILVEY & REID, L.L.C., Fredericktown, Missouri, and respectfully requests an order of the Missouri Public Service Commission to permit it to intervene in this matter, and as grounds therefor states as follows:

- 1. That INTERVENOR operates an aluminum plant in New Madrid County, Missouri, and obtains all of its natural gas transportation for the operation of said aluminum plant through Associated Natural Gas Company.
- 2. That by reason of the natural gas transportation obtained as set forth in Paragraph 1, INTERVENOR is the largest single customer of Associated Natural Gas Company and is the sole customer

under Associated Natural Gas Company's large industrial interruptible rate. As such, INTERVENOR's request is different from any other party's, and INTERVENOR's interests cannot be protected by any other party.

- 3. That Associated Natural Gas Company seeks to obtain authority from the Missouri Public Service Commission to sell and transfer its assets in Missouri to Atmos Energy Corporation.
- 4. That at this point in time, INTERVENOR cannot state whether it is opposed to or agrees with the proposed sale and transfer for the reason that it has been unable to analyze whether or not such sale and transfer will have an impact upon its operation.
- 4. Other than as set forth in said Paragraph 4 above, INTERVENOR does not have sufficient knowledge or information at this time to make an informed judgment to support or oppose the sale and transfer as requested, but respectfully requests permission to intervene in this matter in order to become informed to make such judgment and to protect the interests of INTERVENOR.

WHEREFORE, Intervenor Noranda Aluminum, Inc. respectfully requests that the Missouri Public Service Commission enter its order authorizing Noranda Aluminum, Inc. to intervene in the aforesaid manner, and further requests that the Missouri Public Service Commission not permit the sale and transfer until such time as said Commission hears and considers all evidence in regard to

the propriety of said proposed changes.

Dated this _16th day of November, 1999.

SCHNAPP, FULTON, FALL, SILVEY & REID, L.L.C.

By:

Robin E. Fulton M.B.E. 29513 135 East Main Street P.O. Box 151 Fredericktown, MO 63645 (573) 783-7212

Attorney for Intervenor Noranda Aluminum, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Application for Intervention was deposited in the United States mail, postage prepaid, on the 16th day November, 1999, to: Gary W. Duffy, Brydon, Swearengen and England, P.C., P.O. Box 456, Jefferson City, MO 65102, Attorney for ANG; James M. Fischer, 101 West McCarty Street, Suite 215, Jefferson City, MO 65101, Attorney for Atmos Energy Corporation; and Office of the Public Counsel, P.O. Box 7800, Jefferson City, MO 65102.

Robin E. Fultor