

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

NOV 21 1997

MISSOURI
PUBLIC SERVICE COMMISSION

In the matter of Missouri Gas Ener-)
gy of Kansas City, Missouri re-)
quested authority to file a tariff)
reflecting a change in rates for)
its Missouri customers)

Case No. GR-98-140

APPLICATION FOR ORDER ALLOWING
INTERVENTION OF MIDWEST GAS USERS ASSOCIATION

Comes now MIDWEST GAS USERS ASSOCIATION ("Midwest") and pursuant to 4 C.S.R. 240-2.110(14)-(16) applies to intervene herein and become a party hereto in respect to the above matter. In support thereof, Midwest respectfully states:

1. Midwest is an unincorporated non-profit association consisting of and representing its membership of business concerns and corporations which are substantial users of natural gas at their plants situated in such states as Kansas, Missouri and Oklahoma of which numerous members have plants and facilities which are located in and consume natural gas within the State of Missouri. A listing of Midwest members and participants is attached hereto as Appendix A.^{1/}

^{1/}The attached listing includes Midwest members and companies that have at various times participated with Midwest in proceedings in Missouri, Kansas and at the Federal Energy Regulatory Commission. Direct participation in a particular case varies depending on the nature of the case and the location and service area of the utility involved. At present, participants in this case are Archer Daniels Midland Company, Lafarge Corporation, the City of Independence, Missouri, TransWorld Airlines and Leggett & Platt, Inc. Other participants are pending and are expected to be drawn from the attached listing.

2. Midwest's interest in proceedings affecting the rates, terms and conditions of large customer natural gas service has been repeatedly recognized by the Missouri Public Service Commission in permitting Midwest's intervention in proceedings affecting The Gas Service Company, its successors, KPL Gas Service Company and Western Resources, Missouri Public Service Company, and various generic dockets involving the terms and conditions of natural gas transportation and purchased gas adjustment clauses for natural gas companies in the State of Missouri. Furthermore, Midwest's interest in proceedings affecting natural gas rates, and the terms and conditions of natural gas service has been recognized by the Federal Power Commission and the Federal Energy Regulatory Commission in granting Midwest's intervention in numerous dockets concerning Williams Natural Gas Pipeline Company and other generic dockets concerning the terms and conditions of natural gas service, including Orders 436, 500, 451, 528, and Order 636.

3. On or about October 3, 1997, Missouri Gas Energy, a Division of Southern Union Corporation (MGE) filed proposed tariffs reflecting an overall annual revenue increase of \$27 million for its Missouri service area. Additional changes were proposed in other terms and conditions of service which may affect the ability of Midwest members to economically transport their natural gas supplies through MGE's facilities. Further, certain changes that were supposedly agreed in a prior MGE docket

do not appear to have been proposed by MGE to be implemented in this filing.

4. As major customers of MGE, Midwest participants, will be affected by the outcome of this docket to a material but as yet undetermined extent.

5. Because MGE transports gas for consumption to Midwest members under separate rate schedules and because of the size and consumption patterns of Midwest's members, Midwest is in the special position of representing interests which will not and cannot be represented adequately by any other party and which interests are direct and immediate and differ from those of the general public. Therefore, it will aid the Commission and protect the public interest that Midwest be permitted to intervene in this proceeding so as to protect its interest which no other party is in a position properly to protect and adequately represent herein.


6. On November 5, 1997, undersigned counsel for Midwest inquired of Mr. Robert Hack, attorney for MGE, regarding this intervention and was advised that MGE would not oppose Midwest's intervention in this proceeding.

WHEREFORE, Midwest prays: (a) that Midwest be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in

argument, should any be had; and (b) for all other needful and proper relief.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



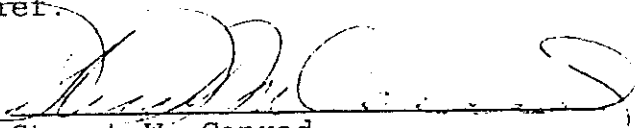
Stuart W. Conrad 23966
3100 Broadway, Suite 1209
Kansas City, Missouri 64111
(816) 753-1122

ATTORNEYS FOR MIDWEST GAS USERS
ASSOCIATION


VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

Comes now Stuart W. Conrad, and having been first duly sworn, states that he is counsel for the within applicant for intervention and has been duly authorized to file this application; that he has read and is familiar with the contents thereof and that the statements therein made are true and correct to the best of his knowledge and belief.


Stuart W. Conrad

IN WITNESS WHEREOF, I have hereunto set my hand and my official seal at my office in Kansas City, Jackson County, Missouri on this 20th day of November, 1997.


Notary Public Within and for
said County and State

(SEAL)

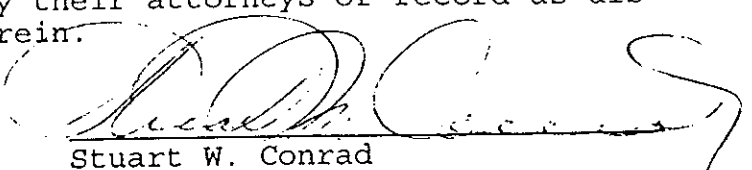
My Commission Expires:

May 29, 2001

Theresa Patterson, Notary Public
Notary Seal
Jackson County, State of Missouri
My Commission Expires: May 29, 2001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition for Leave to Intervene by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as disclosed by the pleadings herein.


Stuart W. Conrad

Dated: November 20, 1997

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APPENDIX A

A D Mohr Farms	Frito Lay
A G Processing Inc.	Gaines Foods
ABB Power T & D Corporation	General Mills
Alameda Plaza Inc.	Griffin Wheel
Alameda Towers	Grinstead Products, Inc.
American Bakeries Co.	GST Steel Company
American Beauty Macaroni	Guardian Management Inc.
Archer Daniels Midland Company	Gulf & Western Mfg.
Ark City Packing Co.	Guys Foods Inc.
Banquet Foods Corporation	Hallmark Cards
Baptist Medical Center	Hamm Asphalt Inc.
Bayer, Inc.	Harvest Brand Inc.
Bethany Hospital	Hercules, Inc.
Blueside Company	Hills Pet Food Division
BMA	Hills Division of Riviana
Bowen Construction Co.	Hospital Linen Service
Butler Manufacturing Co.	Hudson Foods, Inc.
Cargill, Inc.	Hudson Farms
Carnation Can Co.	Hudson Food Protein
Carnation Pet Co.	ICI Explosives USA, Inc.
Castlegate Ind. Inc.	J C Nichols Co.
Certain-Teed Products Inc.	Kansas City Terminal Railway
Chesebrough-Ponds, Inc.	Koppers Co. Inc.
City of Osborne	Krause Milling Co.
City of Holton	Lafarge Corporation
City of Minneapolis	Lawrence Paper Company
City of Independence, Missouri	Leggett & Platt
City of Palmyra	M F A Milling
City of Ottawa	M K T Railroad
City of Beloit	Hoeschst Marion Roussel
City of Baldwin	Maytag Corporation
City of Ossawatimie	McNally Pittsburg
City of Sabetha	Medical Center of Independence
City of Horton	Menorah Medical Center
City of Lincoln	Mid America Dairymen
City of Augusta	Midwest Conveyor
Coleman Alfalfa	Midwest Grain Products
Colgate Palmolive	Milnot Company
Continental Baking Company	Mission Clay Products
Cook Paint & Varnish	Missouri Steel Castings
Corn Products Company	Missouri Plating Co.
Doanes Products	Modine Manufacturing Company
Empire Cold Storage	National Starch Company
Fairbanks Morse Pump	National ByProducts
Fairbanks Morse & Co.	North Kansas City Memorial
Fairmont C. C. Dairy	Hospital
Fasco Products, Inc.	O'Sullivan Industries
Faultless Laundry	Owens Corning Fiberglas
Ford Motor Co.	Pet Milk Co.
Fox Run Apartments	Philadelphia Quartz Co.

Pittsburgh Corning
Proctor & Gamble Co.
Quaker Oats
Ralston Purina Co.
Reichhold Chemical Inc.
Research Hospital
Reynolds Metals Co.
Rival Manufacturing Co.
Safeway Stores
Santa Fe Railroad
Sealright Mfg. Co.
Sears Roebuck & Co.
Seitz Foods Inc.
Southwest Oil & Grease
Sperry Vickers
St. John's Hospital
St. Joseph Light & Power
St. Joseph's Center
St. Francis Hospital
St. Mary's Hospital
St. Joseph, Missouri
St. Joseph's Hospital
St. Lukes Hospital
Stahl Specialty Co.
Standard Refining
Steffen Dairy
Swift and Company
Swift Ind. Packing Co.
Teva Pharmaceuticals, Inc.
Thomas J. Lipton Inc.
Thompson Industries
Tower Metal Products
Town of Carrollton
TransWorld Airlines
Trigen - Kansas City District
Trinity Lutheran Hospital
Trumbull Asphalt
U S Gypsum
Vance Brothers Asphalt
W R Grace & Co.
Wells Aluminum Inc.
Winchester Foods Inc.
Wire Rope Corporation