

HENRY ANDRAE (Retired)
RICHARD S. BROWNLEE III
MICHAEL A. DALLMEYER
DUANE E. SCHREIMANN
DOUGLAS L. VAN CAMP
MICHAEL G. BERRY
JOHN W. KUEBLER
SUSAN M. TURNER
CHRISTOPHER F. RACKERS
SARA C. MICHAEL
BRIAN K. FRANCKA
SHANE L. FARROW
THOMAS G. PIRMANTGEN
KEITH A. WENZEL
ANDREW B. BLUNT
HEATHER D. RICHENBERGER

HENDREN AND ANDRAE, L.L.C.
ATTORNEYS AT LAW

RIVERVIEW OFFICE CENTER
221 BOLIVAR STREET, SUITE 300
P.O. BOX 1069
JEFFERSON CITY, MISSOURI 65102

www.hendrenandrae.com

(573) 636-8135
(573) 636-5226 (FAX)

RODNEY D. GRAY
OF COUNSEL

HENRY ANDRAE (Retired)

JOHN H. HENDREN (1907-1988)
CHARLES H. HOWARD (1925-1970)
JOHN E. BURRUSS, JR. (1933-1985)
GERALD E. ROARK (1956-1995)

E-MAIL

richardb@hendrenandrae.com

August 14, 2002

FILED³

AUG 14 2002

**Missouri Public
Service Commission**

Mr. Dale Hardy Roberts
Executive Secretary
Missouri Public Service Commission
200 Madison Street, PO Box 360
Jefferson City, MO 65102-0360

RE: In the Matter of the Tariff Filing Of Fidelity Natural
Gas - Case No. GT-2003-0036
Tariff No. JG-2003-0045

Dear Mr. Roberts:

Enclosed please find for filing the original plus eight (8)
copies of a Motion To Intervene on behalf of Missouri School
Boards' Association in the above-captioned matter.

If you should have any questions concerning the enclosed
filing, please do not hesitate to contact me. Thank you.

Very truly yours,

HENDREN AND ANDRAE, L.L.C.

Richard S. Brownlee III
Richard S. Brownlee, III

RSB\s
Enclosures
All Counsel of Record
Melissa Randol

FILED³

BEFORE THE PUBLIC SERVICE COMMISSION

AUG 14 2002

OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Tariff)
Filing Of Fidelity Natural) Case No. GT-2003-0036
Gas) Tariff No. JG-2003-0045

MOTION TO INTERVENE

COMES NOW, Missouri School Boards' Association (hereafter "MSBA") by and through its Counsel, Hendren and Andrae, L.L.C., Richard S. Brownlee, III, and for its Application to Intervene pursuant to 4 CSR 240-2.075 states:

1. MSBA is a Missouri not-for-profit corporation organized pursuant to Section 501(c)(6), IRC, and is comprised of a membership of 393 school districts with 1,995 school locations in the State of Missouri. MSBA's mission is to advance excellence in student achievement through school board leadership. MSBA pursues its mission by promoting beneficial cost saving programs for public schools, allowing more resources to be devoted to students and the educational process.

2. The Missouri Ninety-First General Assembly, Second Regular Session, passed CCS for SCS for HB 1402 which provided, inter alia, that gas corporations certificated by the Missouri Public Service Commission are required to file tariffs which allow the aggregate combination of natural gas supply and transportation services, including storage, to enhance the

purchasing requirement of eligible school entities. MSBA is authorized to coordinate and provide the aggregate purchasing of natural gas supplies and pipeline transportation services under the tariff's filed by applicant in this present proceeding on behalf of its eligible school entities in accordance with aggregate purchasing contracts negotiated by and through MSBA as a not-for-profit school association.

3. All correspondence dealing with this matter should be directed to:

Richard S. Brownlee, III
Hendren and Andrae, L.L.C.
221 Bolivar Street
P.O. Box 1069
Jefferson City, MO 65102
(573) 636-8135
(573) 636-4905 (Facsimile)

Ms. Melissa Randol
Missouri School Boards'
Association
2100 I-70 Drive Southwest
Columbia, MO 65203
(800) 221-6722
(573) 445-9981

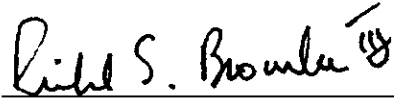
4. MSBA and its members have a direct interest in this proceeding which is not similar to the public generally and which cannot be adequately represented by any other party to this proceeding. Further, by representing 393 school districts, the intervention of MSBA is in the interest of judicial economy and would serve the public interest as it relates to this proceeding.

5. A list of MSBAs' membership is attached hereto-marked EXHIBIT A.

WHEREFORE, MSBA respectfully requests the Court issue an Order permitting MSBA to intervene in the above-captioned matter.

Respectfully submitted,

HENDREN AND ANDRAE, L.L.C.



Richard S. Brownlee, III, #22422
221 Bolivar Street, Suite 300
P.O. Box 1069
Jefferson City, MO 65102
573) 636-8135
573) 636-4905 (Facsimile)
ATTORNEYS FOR INTERVENOR

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been mailed or and-delivered to the following on this 14th day of August, 2002:

James M. Fischer
101 Madison Street
Suite 400
Jefferson City, MO 65101

Office of Public Counsel
P.O. Box 7800
Jefferson City MO 65102

General Counsel
MO Public Service Commission
P.O. Box 360
Jefferson City MO 65102

Robert J. Hank
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111-2404



Richard S. Brownlee, III

MSBA Member Districts

District	DistCode	District	DistCode
Adair Co. R-I	001-090	Central R-III	094-086
Adair Co. R-II	001-092	Centralia R-VI	010-091
Adrian R-III	007-123	Chaffee R-II	100-060
Advance R-IV	103-129	Charleston R-I	067-061
Afton 101	096-098	Chilhowee R-IV	051-153
Alton R-IV	075-087	Chillicothe R-II	059-117
Appleton City R-II	093-120	Clark Co. R-I	023-101
Arcadia Valley R-II	047-062	Clarksburg C-2	068-075
Ash Grove R-IV	039-135	Clarkton C-4	035-097
Aurora R-VIII	055-110	Clayton	096-102
Ava R-I	034-124	Clever R-V	022-092
Avenue City R-IX	002-090	Climax Springs R-IV	015-003
Avilla R-XIII	049-135	Clinton	042-124
Bakersfield R-IV	077-101	Clinton Co. R-III	025-003
Bayless	096-099	Cole Camp R-I	008-111
Bell City R-II	103-128	Cole Co. R-I	026-001
Belton 124	019-152	Cole Co. R-II	026-002
Billings R-IV	022-091	Columbia 93	010-093
Bismarck R-V	094-076	Concordia R-II	054-037
Bloomfield R-XIV	103-131	Couch R-I	075-084
Blue Eye R-V	104-045	Crane R-III	104-043
Blue Springs R-IV	048-068	Crawford Co. R-I	028-101
Bolivar R-I	084-001	Crawford Co. R-II	028-102
Boncl R-X	082-105	Crocker R-II	085-049
Boone Co. R-IV	010-089	Crystal City 47	050-013
Boonville R-I	027-061	Dallas Co. R-I	030-093
Bosworth R-V	017-124	Davis R-XII	042-119
Bowling Green R-I	082-100	De Soto 73	050-014
Bradleyville R-I	106-001	Delta C-7	078-009
Branson R-IV	106-004	Dent-Phelps R-III	033-093
Brentwood	096-101	Dexter R-XI	103-132
Brookfield R-III	058-112	Diamond R-IV	073-102
Brunswick R-II	021-149	Dixon R-I	085-048
Buchanan Co. R-IV	011-079	Doniphan R-I	091-092
Bucklin R-II	058-107	Dora R-III	077-103
Bunker R-III	090-077	Drexel R-IV	019-150
Butler R-V	007-129	Dunklin R-V	050-005
Callao C-8	061-157	East Buchanan Co. C-1	011-076
Camdenton R-III	015-002	East Newton Co. R-VI	073-099
Cameron R-I	025-001	East Prairie R-II	067-055
Campbell R-II	035-093	El Dorado Springs R-II	020-002
Canton R-V	056-015	Eldon R-I	066-102
Cape Girardeau 63	016-096	Eminence R-I	101-107
Carl Junction R-I	049-132	Everton R-III	029-003
Carrollton R-VII	017-125	Excelsior Springs 40	024-089
Carthage R-IX	049-142	Exeter R-VI	005-122
Caruthersville 18	078-012	Fair Grove R-X	039-142
Cassville R-IV	005-123	Fairview R-XI	046-140
Center 58	048-080	Farmington R-VII	094-078

EXHIBIT

A

MSBA Member Districts

District	DistCode	District	DistCode
Fayette R-III	045-077	Houston R-I	107-152
Ferguson-Florissant R-II	096-089	Iberia R-V	066-107
Festus R-VI	050-006	Independence 30	048-077
Forsyth R-III	106-003	Iron Co. C-4	047-065
Fort Osage R-I	048-066	Jackson R-II	016-090
Fox C-6	050-012	Jefferson C-123	074-195
Francis Howell R-III	092-088	Jefferson City	026-006
Franklin Co. R-II	036-123	Jefferson Co. R-VII	050-007
Fredericktown R-I	062-072	Jennings	096-104
Ft. Zumwalt R-II	092-087	Johnson Co. R-VII	051-154
Fulton 58	014-129	Joplin R-VIII	049-148
Gainesville R-V	077-102	Junction Hill C-12	046-137
Galena R-II	104-042	Kansas City 33	048-078
Gallatin R-V	031-121	Kearney R-I	024-086
Gasconade C-4	053-112	Kelso C-7	100-064
Gasconade Co. R-I	037-039	Kennett 39	035-102
Gasconade Co. R-II	037-037	Kingston 42	013-062
Gideon 37	072-073	Kingston K-14	110-014
Gilliam C-4	097-127	Kingsville R-I	051-150
Glenwood R-VIII	046-135	Kirbyville R-VI	106-006
Golden City R-III	006-103	Kirksville R-III	001-091
Grain Valley R-V	048-069	Kirkwood R-VII	096-092
Grandview C-4	048-074	Knob Noster R-VIII	051-155
Green Forest R-II	033-092	La Monte R-IV	080-118
Green Ridge R-VIII	080-121	Laclede Co. C-5	053-114
Greene Co. R-VIII	039-139	Laclede Co. R-I	053-111
Greenfield R-IV	029-004	Ladue	096-106
Greenville R-II	111-086	Lafayette Co. C-1	054-039
Grundy Co. R-V	040-100	Lamar R-I	006-104
Hale R-I	017-121	Laredo R-VII	040-104
Halfway R-III	084-003	Lathrop R-II	025-002
Hamilton R-II	013-055	Lawson R-XIV	089-080
Hancock Place	096-103	Lebanon R-III	053-113
Hannibal 60	064-075	Lee's Summit R-VII	048-071
Hardeman R-X	097-122	Leesville R-IX	042-118
Harrisburg R-VIII	010-092	Leeton R-X	051-156
Harrisonville R-IX	019-149	Lesterville R-IV	090-078
Hartville R-II	114-113	Lewis Co. C-1	056-017
Hayti R-II	078-002	Lexington R-V	054-045
Hazelwood	096-088	Liberal R-II	006-101
Henry Co. R-I	042-111	Liberty 53	024-090
Hickman Mills C-1	048-072	Licking R-VIII	107-154
Hickory Co. R-I	043-001	Lindbergh R-VIII	096-093
Higbee R-VIII	088-075	Linn Co. R-I	058-106
Hillsboro R-III	050-003	Livingston Co. R-III	059-114
Holcomb R-III	035-094	Lockwood R-I	029-001
Holden R-III	051-152	Lone Jack C-6	048-075
Holliday C-2	069-107	Louisiana R-II	082-108
Hollister R-V	106-005	Luray 33	023-099

MSBA Member Districts

District	DistCode	District	DistCode
Macks Creek R-V	015-004	Nixa R-II	022-089
Macon Co. R-I	061-156	Nodaway-Holt R-VII	074-187
Macon Co. R-IV	061-158	Normandy	096-109
Madison C-3	069-108	North Andrew Co. R-VI	002-089
Malden R-I	035-092	North Harrison R-III	041-003
Malta Bend R-V	097-119	North Kansas City 74	024-093
Manes R-V	114-116	North Nodaway Co. R-VI	074-197
Mansfield R-IV	114-115	North St. Francois Co. R-I	094-083
Maplewood-Richmond Hghts	096-107	North Wood R-IV	033-094
Maries Co. R-I	063-066	Northeast Nodaway Co. R-V	074-194
Maries Co. R-II	063-067	Northwest R-I	050-001
Marion C. Early R-V	084-005	Oak Grove R-VI	048-070
Marionville R-IX	055-106	Oak Hill R-I	033-091
Marquand-Zion R-VI	062-070	Oak Ridge R-VI	016-094
Marshall	097-129	Odessa R-VII	054-041
Maryville R-II	074-201	Oreaville R-IV	097-118
Maysville R-I	032-055	Oregon-Howell R-III	075-086
McDonald Co. R-I	060-077	Orrick R-XI	089-087
Mehlville R-IX	096-094	Osage Co. R-I	076-081
Meramec Valley R-III	036-126	Osage Co. R-II	076-082
Mexico 59	004-110	Osage Co. R-III	076-083
Miami R-I	007-121	Osborn R-O	032-054
Mid-Buchanan Co. R-V	011-078	Osceola	093-124
Middle Grove C-1	069-104	Otterville R-VI	027-058
Midway R-I	019-151	Ozark R-VI	022-093
Milan C-2	105-124	Palmyra R-I	064-074
Miller R-II	055-104	Paris R-II	069-109
Moberly	088-081	Park Hill	083-005
Monett R-I	005-128	Parkway C-2	096-095
Moniteau Co. R-I	068-070	Pattonville R-III	096-090
Moniteau Co. R-VI	068-073	Pemiscot Co. R-III	078-003
Monroe City R-I	069-106	Perry Co. 32	079-077
Montgomery Co. R-II	070-093	Pettis Co. R-XII	080-122
Morgan Co. R-II	071-092	Pierce City R-VI	055-105
Mountain Grove R-III	114-114	Pike Co. R-III	082-101
Mt. Vernon R-V	055-108	Plainview R-VIII	034-122
Mtn View-Birch Tree R-III	046-130	Platte Co. R-III	083-003
Naylor R-II	091-091	Pleasant Hill R-III	019-148
Neelyville R-IV	012-108	Pleasant View R-VI	040-103
Nell Holcomb R-IV	016-097	Polo R-VII	013-059
Neosho R-V	073-108	Poplar Bluff R-I	012-109
Nevada R-V	108-142	Potosi R-III	110-029
New Bloomfield R-III	014-127	Princeton R-V	065-098
New Franklin R-I	045-076	Pulaski Co. R-IV	085-044
New Haven	036-138	Purdy R-II	005-124
New Madrid Co. R-I	072-074	Ralls Co. R-II	087-083
New York R-IV	013-057	Raymore-Peculiar R-II	019-142
Newburg R-II	081-095	Raytown C-2	048-073
Niangua R-V	112-099	Reeds Spring R-IV	104-044

MSBA Member Districts

District	DistCode		
Renick R-V	088-073	St. Louis Special	096-119
Republic R-III	039-134	State Board of Education	199-000
Revere C-3	023-096	Ste. Genevieve R-II	095-059
Richmond R-XVI	089-089	Steelville R-III	028-103
Richwoods R-VII	110-030	Stet R-XV	089-077
Ridgeway R-V	041-005	Stewartsville C-2	032-058
Ripley Co. R-IV	091-093	Strafford R-VI	039-137
Ritenour	096-110	Sturgeon R-V	010-090
Riverview Gardens	096-111	Success R-VI	107-151
Rockwood R-VI	096-091	Sullivan	036-137
Rolla 31	081-096	Swedeborg R-III	085-043
Roscoe C-1	093-121	Sweet Springs R-VII	097-131
Salem R-80	033-090	Thayer R-II	075-085
Savannah R-III	002-097	Tina-Avalon R-II	017-122
School of Osage R-II	066-105	Trenton R-IX	040-107
Schuyler Co. R-I	098-080	Tri-County R-VII	031-122
Scotland Co. R-I	099-082	Troy R-III	057-003
Scott City R-I	100-059	Twin Rivers R-X	012-110
Sedalia 200	080-125	Union R-XI	036-131
Senath-Hornersville C-8	035-098	University City	096-112
Seneca R-VII	073-106	Valley Park	096-113
Shawnee R-III	042-113	Valley R-VI	110-031
Shelby County R-IV	102-085	Van Buren R-I	018-050
Shell Knob 78	005-127	Van-Far R-I	004-109
Sherwood Cass R-VIII	019-144	Walnut Grove R-V	039-136
Sikeston R-VI	100-063	Warren Co. R-III	109-003
Silex R-I	057-001	Warrensburg R-VI	051-159
Slater	097-130	Warsaw R-IX	008-107
Smithville R-II	024-087	Washington	036-139
South Callaway Co. R-II	014-130	Waynesville R-VI	085-046
South Harrison Co. R-II	041-002	Webster Groves	096-114
South Iron Co. R-I	047-060	Wellington Napoleon R-IX	054-043
South Nodaway Co. R-IV	074-202	Wellston	096-115
South Pemiscot Co. R-V	078-005	Wellsville Middletown R-I	070-092
Southern Boone Co. R-I	010-087	Wentzville R-IV	092-089
Southern Reynolds Co R-II	090-076	West Nodaway Co. R-I	074-190
Southwest Livingston R-I	059-113	West Plains R-VII	046-134
Southwest R-V	005-121	West Platte Co. R-II	083-002
Sparta R-III	022-090	West St. Francois R-IV	094-087
Spickard R-II	040-101	Westran R-I	088-080
Spokane R-VII	022-094	Westview C-6	073-105
Spring Bluff R-XV	036-134	Wheatland R-II	043-002
Springfield R-XII	039-141	Wheaton R-III	005-120
St. Charles Co. R-V	092-091	Willard R-II	039-133
St. Charles R-VI	092-090	Willow Springs R-IV	046-131
St. Clair R-XIII	036-136	Windsor C-1	050-010
St. James R-I	081-094	Winston R-VI	031-117
St. Joseph	011-082	Woodland R-IV	009-080
St. Louis City	115-115	Wright City R-II	109-002
		Wyaconda C-1	023-094