

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 P. 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

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

Missouri Public
Service Commission

RE: In the Matter of the Tariff Filing Of Southern
Missouri Gas Company, L.P.
Case No. GT-2003-0031, Tariff No. JG-2003-0047

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

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
AUG 14 2002

Missouri Public
Service Commission

In the Matter of the Tariff)
Filing Of Southern Missouri)
Gas Company, L.P.)
Case No. GT-2003-0031
Tariff No. JG-2003-0047

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

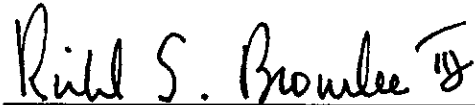
4. MSBA and its members have a direct interest in this proceeding which is not similar to the public generally and which cannot be adequately represented by any other party to this proceeding. Further, by representing 393 school districts, the intervention of MSBA is in the interest of judicial economy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

5. A list of MSBA's 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

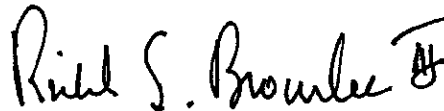
CERTIFICATE OF SERVICE

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
Fischer & Dority
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

A handwritten signature in dark ink, reading "Richard S. Brownlee III". The signature is written in a cursive style with a large, stylized "R" and "B".

Richard S. Brownlee, III

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Tariff)	
Filing Of Southern Missouri)	<u>Case No. GT-2003-0031</u>
Gas Company, L.P.)	Tariff No. JG-2003-0047

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	Ms. Melissa Randol
Hendren and Andrae, L.L.C.	Missouri School Boards'
221 Bolivar Street	Association
P.O. Box 1069	2100 I-70 Drive Southwest
Jefferson City, MO 65102	Columbia, MO 65203
(573) 636-8135	(800) 221-6722
(573) 636-4905 (Facsimile)	(573) 445-9981

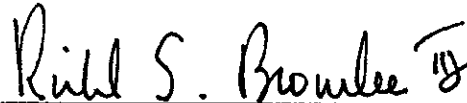
4. MSBA and its members have a direct interest in this proceeding which is not similar to the public generally and which cannot be adequately represented by any other party to this proceeding. Further, by representing 393 school districts, the intervention of MSBA is in the interest of judicial economy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

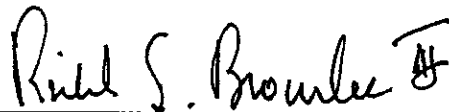
CERTIFICATE OF SERVICE

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
Fischer & Dority
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

A handwritten signature in dark ink, reading "Richard S. Brownlee, III". The signature is written in a cursive style with a large, stylized "R" and "B".

Richard S. Brownlee, III