

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

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

MOTION FOR REHEARING

Comes now MoGas Pipeline LLC ("MoGas") pursuant to 4CSR 240-2.160 and for its Motion for Rehearing states to the Commission:

1. On July 28, 2010, the Commission issued its Order Granting Application to Intervene ("Commission Order") which allowed MoGas Pipeline LLC ("MoGas") to intervene in this case.

2. On August 5, 2010, AmerenUE ("Ameren") filed its Notice for Reconsideration of Order Granting Application to Intervene.

3. On August 13, 2010, MoGas filed its Response to Ameren's Motion for Reconsideration.

4. On September 1, 2010, the Commission issued its Order Granting Ameren's Motion for Reconsideration, reversing its previous order granting MoGas' intervention and denying MoGas' application to intervene.

5. The Commission's Order granting Ameren's Motion for Reconsideration is unlawful, unjust and unreasonable because:

a) The Commission erred when it concluded that "MoGas' participation will result in increased litigation costs." There are no facts in evidence that would allow the Commission to so conclude nor has the Commission cited to any such evidence to support its conclusion.

b) The Commission erred when it concluded that MoGas' participation "cannot possibly serve the public interest" because the Commission's conclusion is speculative and wholly unsupported by any evidence or findings of fact.

c) Finally, the Commission erred when it concluded that "MoGas has failed to show that its interest will be affected by an outcome in this case" because 4 CSR 240-2.075(2) states:

(2) An application to intervene shall state the proposed intervenor's interest in the case and reasons for seeking intervention, and shall state whether the proposed intervenor supports or opposes the relief sought or that the proposed intervenor is unsure of the position it will take. (emphasis added).

MoGas' Response to AmerenUE's Opposition to Its Application to Intervene filed on July 16, 2010 cited to the Direct Testimony of AmerenUE's witness, Emma B. Cruthis who made 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 further suggested that Ms. Cruthis' Direct Testimony regarding MoGas' cases before FERC clearly established that MoGas has an interest in this case and that its interests may well be different than the general public. MoGas further stated that it did not know how its interest may be adversely affected, directly or collaterally, by a final order in this case, but wanted to participate to protect its interests and insure that the Commission was fully informed on the numerous FERC cases involving MoGas that Ms. Cruthis cited.

d) The Commission properly concluded in its Order Granting Intervention issued on July 28, 2010 that MoGas' intervention serves the public interest. The Commission's Order

reversing its initial determination is unsupported by any competent evidence and is therefore unreasonable and unlawful.

WHEREFORE, MoGas Pipeline LLC (“MoGas”) respectfully requests the Commission to grant its Motion for Rehearing.

Respectfully submitted,

CURTIS, HEINZ
GARRETT & O’KEEFE, P.C.

/s/ Leland B. Curtis

Leland B. Curtis, #20550
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
lcurtis@lawfirmemail.com
Attorney for MoGas Pipeline LLC (“MoGas”)

CERTIFICATE OF MAILING

A true and correct copy of the foregoing was emailed or faxed this 10th day of September, 2010, to:

Dean L. Cooper
Brydon, Swearengen & England, P.C.
P.O. Box 456
Jefferson City, Missouri 65102-0456
dcooper@brydonlaw.com

Office of Public Counsel
P.O. Box 2230
Jefferson City, Missouri 65102
opcservice@ded.mo.gov

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

Eric Dearmont
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, Mo 65102
eric.dearmont@psc.mo.gov

Steven R. Sullivan
Wendy Tatro
P.O. Box 66149 (MC 1300)
1901 Chouteau Avenue
AmerenUEService@ameren.com

/s/ Leland B. Curtis
