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July 8, 2002

Missouri Public Service Commission Attn: Secretary of the Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Mo. 65102-0360

RE: Case No. GR-98-167

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a Motion for Reconsideration or Clarification on behalf of Riverside Pipeline Company, L.P., Mid-Kansas Partnership and Kansas Pipeline Company.

Copies of this filing have on this date been mailed or hand-delivered to counsel of record. Thank you for your attention to this matter.

Sincerely

Jeffrey A. Keevil

JAK/er Enclosures

cc:

counsel of record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy's)	
Purchased Gas Cost Adjustment Tariff)	Case No. GR-98-167
Revisions to be Reviewed in its 1997-1998)	
Actual Cost Adjustment)	•

MOTION FOR RECONSIDERATION OR CLARIFICATION

COME NOW Intervenors Riverside Pipeline Company, L.P., Mid-Kansas

Partnership and Kansas Pipeline Company (collectively "Intervenors"), pursuant to 4

CSR 240-2.160, and for this Motion for Reconsideration or Clarification respectfully state as follows:

- 1. On July 2, 2002, the Commission issued, by delegation of authority, its Order Granting Motion for Extension of Time to File Procedural Schedule ("Order"), with an effective date of July 12, 2002, in response to Staff's Motion for Extension of Time to File Procedural Schedule which was filed herein on June 28, 2002.
- 2. In its Order, the Commission stated that "Staff's motion indicates that the extension of time is needed to allow Staff, and the other parties, an opportunity to respond to a pleading filed on June 27 by [Intervenors]." This is incorrect. Staff's motion indicated that Missouri Gas Energy's ("MGE") response to Staff's recommendation in Case No. GR-2001-382 is due on July 12, 2002, and Staff desires an opportunity to review MGE's response before proposing a procedural schedule herein, for whatever reason. A review of Staff's motion clearly shows that Staff's request for an extension was not motivated by Intervenors' pleading filed on June 27. Staff, and any other parties, should be required to respond to Intervenors' pleading of June 27 within 10

days of June 27 as required by 4 CSR 240-2.080(15); at no time have Intervenors agreed to an extension of this requirement.

3. Intervenors did not object to extending the date for filing a proposed procedural schedule beyond July 1; indeed, as reflected in Intervenors' June 27 pleading, Intervenors believe that it would be premature to file or order any procedural schedule in this case until a final, non-appealable judicial resolution of Case No. GR-96-450, including any potential judicial review after a Commission decision on remand, has been reached. Intervenors did not agree that a procedural schedule should be filed on July 26, 2002, as set forth in the Order and Staff's motion. Instead, as requested in Intervenors' June 27 pleading, the Commission should issue an order ordering that this case be held open without a procedural schedule pending a final, non-appealable judicial resolution of Case No. GR-96-450, including any potential judicial review after a Commission decision on remand thereof. This would obviously alleviate the need to file a procedural schedule on July 26.

WHEREFORE, Intervenors request the Commission issue an order (i) clarifying that Staff's motion was not motivated by Intervenors' June 27 pleading herein and further (ii) clarifying that Staff and any other parties had 10 days from June 27 in which to respond to Intervenors' June 27 pleading as required by 4 CSR 240-2.080(15) and (iii) reconsidering its Order of July 2, 2002, by ruling on Intervenors' June 27 pleading and ordering that this case be held open without a procedural schedule pending a final, non-appealable judicial resolution of Case No. GR-96-450, including any potential judicial review after a Commission decision on remand thereof, thereby removing the need for the parties to file a proposed procedural schedule herein on July 26, 2002.

Respectfully submitted,

entrel A Keevil

Missouri Bar No. 33825

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ATTORNEY FOR RIVERSIDE

PIPELINE COMPANY, L.P.,

MID-KANSAS PARTNERSHIP, AND

KANSAS PIPELINE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to counsel for parties of record on this 8th day of July, 2002.