

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

In the Matter of Missouri Gas Energy and)	
Its Tariff Filing to Implement a General Rate)	
Increase for Natural Gas Service)	<u>File No. GR-2009-0355</u>
)	Tariff No. YG-2009-0714

**MISSOURI DEPARTMENT OF NATURAL RESOURCES' APPLICATION TO
INTERVENE**

COMES NOW Missouri Department of Natural Resources (MDNR) and, pursuant to Commission Rule 4 CSR 240-2.075, respectfully requests that the Commission issue its order granting MDNR's Application to Intervene. For its Application, MDNR states as follows:

1. On April 2, 2009, Missouri Gas Energy, a division of Southern Union Company, submitted to the Commission proposed tariffs seeking to implement a general rate increase for natural gas service. By order dated April 6, 2009, the Commission issued its Suspension Order and Notice Order Setting Hearings, And Order Directing Filing. In its April 6, 2009, Order, the Commission established an intervention deadline of April 27, 2009.

2. MDNR, and specifically its Energy Center, is a state agency vested with the powers and duties set forth in Section 640.150, RSMo.

3. MDNR has an interest different than that of the general public, and its intervention will serve a public interest in that the Energy Center will be looking at the proposed filing from a formal policy and planning perspective as well as looking at the potential impacts on environmental quality. The Energy Center's review also will be in relation to the mandate set forth in Section 640.150, RSMo. The mandate set forth in the

statute includes planning for energy resource development; analyzing energy management issues; consulting and cooperating with all state and federal governmental agencies on matters of energy research and development, management, conservation and distribution; assessing the potential impacts on environmental quality; and analyzing the potential for increased use of energy alternatives and making recommendations for the expanded use of such alternate energy sources and technologies.

WHEREFORE, the Missouri Department of Natural Resources respectfully requests that it be allowed to intervene in the above-styled matter.

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/Sara B. Callier

Sarah B. Callier, MBE 59918
Shelley A. Woods , MBE 33525
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
573-751-0052
573-751-8796 (fax)
sarah.callier@ago.mo.gov
shelley.woods@ago.mo.gov

Attorneys for Missouri Department of Natural Resources

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 27th day of April, 2009.

James C. Swearengen, Esq.
Brydon, Swearengen & England, P.C.
312 East Capitol Avenue
Post Office Box 456
Jefferson City, Missouri 65102

Office of Public Counsel
Post Office Box 2230
Jefferson City, Missouri 65102

/s/Sara B. Callier

Sarah B. Callier