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ORIGINAL

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January 31, 2001

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

FILED³
JAN 31 2001
Missouri Public
Service Commission

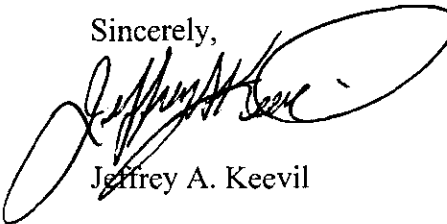
RE: Case No. GR-2001-382
Missouri Gas Energy

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of an Application for Intervention on behalf of 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**

FILED

JAN 31 2001

Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)	
Purchased Gas Adjustment Tariff)	Case No. GR-2001-382
Revisions to be Reviewed in Its 2000-2001)	
Actual Cost Adjustment.)	

APPLICATION FOR INTERVENTION

COMES NOW Kansas Pipeline Company ("KPC") and in accordance with 4 CSR 240-2.075, applies to intervene and become a party in the above-referenced case and, in support of this Application For Intervention, respectfully states as follows:

1. KPC, a Kansas General Partnership, is a FERC-jurisdictional supplier of natural gas transportation service in the State of Missouri (Kansas City, Missouri metro area) to Missouri Gas Energy ("MGE"), a division of Southern Union Company ("Southern Union"). KPC began supplying such service to MGE on or about June 1, 1998.

2. KPC has a direct interest in this proceeding as a supplier of natural gas transportation service to MGE, since Staff may assert that some of the costs associated therewith may be subject to review in this case¹. As such, KPC has an interest in this proceeding which is different from that of the general public. No other party to this proceeding can adequately represent the interests of KPC. Further, the granting of the intervention of KPC will in no way hinder or delay the timely completion of this case, as

¹ KPC and its predecessors (Riverside Pipeline Company, L.P. and Mid-Kansas Partnership) believe the Staff is precluded from reviewing the prudence of the subject contract(s) based upon the Commission-approved Stipulation in Case Nos. GR-94-101 and GR-94-228.

the case has been opened fairly recently, the Commission has not yet issued its order giving formal notice of the case and setting an intervention date, and under normal Commission procedure the case would not be the subject of Staff review until the conclusion of the 2000-2001 ACA period. While KPC does not currently have sufficient information to take a position herein, KPC is concerned that decisions or orders of the Commission herein could adversely impact it.

3. Because KPC may be directly and adversely affected by the Commission's decisions and orders in this case, KPC has a direct interest in this proceeding which is different from that of the general public, and which cannot be adequately represented by any other party. Furthermore, granting the proposed intervention will serve the public interest by allowing the input of one of MGE's material transporters to be brought before the Commission. Accordingly, KPC submits that it meets the criteria for intervention set forth in 4 CSR 240-2.075 and that this Application For Intervention should be granted. Furthermore, the Commission has previously recognized the standing of KPC and its predecessors to intervene in these proceedings by granting intervention to KPC and/or its predecessors in numerous ACA proceedings involving MGE and/or its predecessor (GR-93-140, GR-94-101, GR-94-228, GR-95-82, GR-96-78, GR-96-450, GR-98-167, GR-99-304 and GR-2000-425).

4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

Jeffrey A. Keevil
Stewart & Keevil, L.L.C.
Cherry Street Centre
1001 Cherry Street, Suite 302
Columbia, Missouri 65201
(573) 499-0635

Chris Kaitson
General Counsel
Kansas Pipeline Company
1100 Louisiana, Ste. 2900
Houston, Texas 77002
(713) 650-8900

(573) 499-0638 (fax)

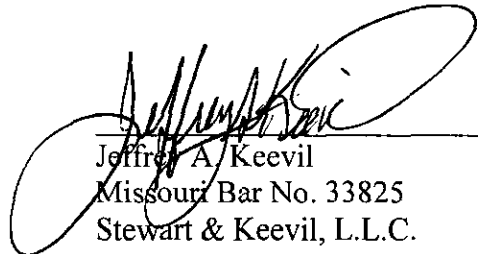
(713) 653-6710 (fax)

with a copy to the following:

Don Whittington
Kansas Pipeline Company
1100 Louisiana, Ste. 2900
Houston, Texas 77002

WHEREFORE, having stated its grounds for intervention, KPC requests the Commission issue its Order granting it leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,

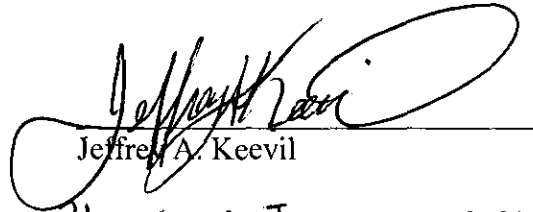


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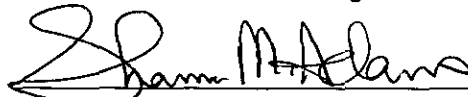
VERIFICATION

STATE OF MISSOURI)
)
COUNTY OF BOONE) ss

I, Jeffrey A. Keevil, being first duly sworn verify that I: am an attorney for Kansas Pipeline Company ("KPC"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing on behalf of KPC; and that the foregoing is correct to the best of my knowledge, information and belief.


Jeffrey A. Keevil

Subscribed and sworn to before me this 31 day of January, 2001.



Shawna M. Adams Notary Public
Notary Public - Notary Seal
STATE OF MISSOURI
Boone County

My Commission expires: My Commission Expires: Jan. 13, 2004



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 or record on this 31st day of January, 2001.

