## 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 Increasing Rates for Natural Gas Service Provided to Customers in the Company's Missouri Service Area.

Case No. GR-2010-0363

## **APPLICATION TO INTERVENE FOR MOGAS PIPELINE LLC**

Comes now MoGas Pipeline LLC ("MoGas") pursuant to 4CSR 240-2.075 and for its

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Application to Intervene states to the Commission:

1. MoGas Pipeline LLC ("MoGas") is a natural gas company engaged in the operation of interstate natural gas pipelines and is regulated by the Federal Energy Regulatory Commission ("FERC") pursuant to the Natural Gas Act (15 U.S.C. 717 et. Seq.). Union Electric Company d/b/a AmerenUE ("AmerenUE") is a shipper on the MoGas pipeline system.

2. All communications and pleadings in this docket should be directed to:

Leland B. Curtis Curtis, Heinz, Garrett & O'Keefe, P.C. 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 726-8789 (Fax) Icurtis@lawfirmemail.com

and

Stephanie Morr General Counsel MoGas Pipeline LLC 110 Algana Ct. St. Peters, MO. 63376 (636) 926-3668 (636) 926-0387 (Fax) smorr@mogaspipe.com 3. On June 11, 2010, AmerenUE submitted to the Commission proposed tariff sheets intended to implement a general rate increase for natural gas service provided to customers in the Company's Missouri Service Area. The proposed tariffs bear a requested effective date of July 11, 2010. The proposed gas service tariffs are designed to produce an annual increase of approximately 7.3% in the Company's revenues. In addition, AmerenUE requests consolidated rates for the Rolla area. As support for this request, AmerenUE submitted the affidavit of Emma N. Cruthis. In her affidavit, Ms. Cruthis repeatedly refers to AmerenUE's relationship with MoGas and its predecessor companies.

4. MoGas Pipeline LLC ("MoGas") seeks to intervene in this rate case proceeding but at this time takes no position on any of the issues underlying the proposed rate increase.

5. MoGas Pipeline LLC's ("MoGas") interests are different from those of the general public.

WHEREFORE, MoGas Pipeline LLC ("MoGas") respectfully requests the Commission to grant its Application to Intervene.

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")

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STATE OF MISSOURI ) ) ss COUNTY OF ST. CHARLES )

## VERIFICATION

I, David Ries, President, MoGas Pipeline LLC, have reviewed and am familiar with the foregoing Application to Intervene. The statements contained in the foregoing Application are true and correct.

David Ries

President, MoGas Pipeline LLC

Subscribed and sworn to before me this 1<sup>st</sup> day of July, 2010.

Patty L. Hawkins Notary Public - Notary Seal STATE OF MISSOURI St. Charles County My Commission Expires: 5/13/2014 Commission #10381568

than Skins Notary Public

## **CERTIFICATE OF MAILING**

A true and correct copy of the foregoing was emailed or faxed this 2<sup>nd</sup> day of July, 2010, to:

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

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

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

/s/ Leland B. Curtis