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October 12, 2000

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

RE: *Associated Natural Gas*
Case No. GR-99-392

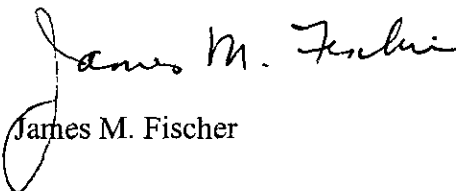
FILED²
OCT 12 2000
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Application to Intervene of Atmos Energy Corporation, through its United Cities Gas Company Division. A copy of the foregoing Application to Intervene has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr
Enclosures

cc: Office of the Public Counsel
Tim Schwarz
Dana K. Joyce
Garry Duffy
Mark S. Kidd

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
OCT 12 2000
Missouri Public
Service Commission

In the Matter of Associated Natural Gas)
Company's Purchased Gas Adjustment) Case No. GR-99-392
Factors to be Reviewed in its 1998-1999)
Actual Cost Adjustment.)

APPLICATION TO INTERVENE

COMES NOW Atmos Energy Corporation, through its United Cities Gas Company Division, (Atmos or Applicant) and pursuant to 4 CSR 240-2.075 respectfully requests the Commission to grant Applicant the right to intervene in this matter. In support of this Application, Atmos states as follows:

1. On March 15, 1999, this case was established in connection with the filing on the same day by Associated Natural Gas Company (ANG), of a proposed tariff sheet with the Missouri Public Service Commission (Commission).

2. On June 30, 2000, the Procurement Analysis Department of the Staff of the Commission (Staff) filed a memorandum indicating that Staff had reviewed the Actual Cost Adjustment (ACA) filing of ANG. In its Memorandum, Staff requested, *inter alia*, that ANG undertake certain reporting requirements in the future.

3. On August 9, 2000, the Commission issued its Order Directing Filing in which it ordered ANG to file a response to the Staff recommendation by September 8, 2000.

4. On September 8, 2000, ANG filed its Response to Order Directing Filing. In its response, ANG noted that the Missouri properties of ANG had been sold to Atmos Energy Corporation. It also suggested that:

[I]t does not appear meaningful for ANG to be required to perform these tasks [i.e. reporting requirements] when ANG has no control over how Atmos will operate the properties. ANG respectfully suggests that Staff may wish to reconsider the need for ANG to perform any of these tasks in light of the fact that Atmos has owned and operated the former ANG properties since June 1, 2000. If the tasks are appropriate, they are the responsibility of Atmos, not ANG.

ANG Response, p. 4.

IDENTITY OF APPLICANT

5. Atmos is a corporate organized and existing under the laws of the State of Texas and the Commonwealth of Virginia, with its principal place of business located at Three Lincoln Center, Suite 1800, 5430 LBJ Freeway, Dallas, Texas 75240. Atmos is a "gas corporation" and "public utility" pursuant to Section 386.020(16) and (32), RSMo 1994,¹ and is under the jurisdiction of the Commission. Atmos conducts all of its utility activities in the state of Missouri through two divisions, the United Cities Gas Division and the Greeley Gas Company Division. On June 1, 2000, Atmos acquired the Missouri property of ANG and began operating the former Missouri service territory of ANG as part of its United Cities Gas Company Division, pursuant to the Commission's Order Approving Stipulation and Agreement, Case No. GM-2000-312 (April 20, 2000).

6. Since Atmos, through its United Cities Gas Company Division, is currently operating the service area formerly operated by ANG, it would be logical for Atmos to address any reporting requirements related to the former ANG properties. Therefore, Atmos has an interest in this proceeding which is different from that of the general public. Atmos' intervention will also promote the public interest.

¹ All citations to statutes refer to the 1994 Revised Statutes unless otherwise stated.

7. All correspondence, pleadings, orders and documents in this proceeding should be addressed to:

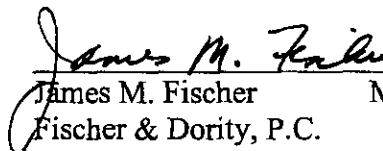
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WHEREFORE, Atmos Energy Corporation, through its United Cities Gas Company Division, respectfully requests the Commission to issue its order granting Atmos the right to intervene in this proceeding.

Respectfully submitted,


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ATTORNEYS FOR
ATMOS ENERGY CORPORATION

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class, postage prepaid, this 12th day of October, 2000, to:

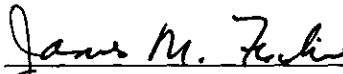
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