P.O. 1916

337 Elephant Rock Road

Camdenton, MO 65020

573 873-5548

[mtmcduffey@yahoo.com](mailto:mtmcduffey@yahoo.com)

June 4, 2012

Missouri Public Service Commission

General Counsel Office

P.O. Box 360

200 Madison Street, Suite 800

Jefferson City, MO 65102

RE: Case No. GA-2012-0285

Enclosed is a signed Application to Intervene in Case No. GA-2012-0285 in the matter of the application of Summit Natural Gas of Missouri, Inc. for a Certificate of Convenience and Necessity to construct, install, own, operate, control, manage and maintain a distribution system in Benton, Morgan, Camden and Miller Counties in Missouri, as a certified area.

The applicant respectfully requests that the Commission give this Application to Intervene it full consideration.

Respectfully submitted,



Michaele McDuffey, Applicant

W/enclosures

BEFORE THE PUBLIC SERVICE COMMISSION

OFTHE STATE OF MISSOURI

In the matter of the application of Summit Natural )

Gas of Missouri, Inc., for a Certificate of )

Convenience and Necessity authorizing it to )

Construct, install, own, operate, control, manage ) Case No. GA-2012-0285

Service in Benton, Morgan, Camden and Miller )

Counties in Missouri, as a certificated area. )

APPLICATION OF MICHAELE MCDUFFEY

TO INTERVENE

COMES NOW, Michaele McDuffey and pursuant to 4 CSR 240-2.075 and paragraph (10) applies to intervene in the above captioned matter and to become a party herein. In support thereof, Michaele McDuffey states as follows.

1. Michaele McDuffey resides with husband, Michael McDuffey, at 337 Elephant Rock Road in Camden County Missouri. The mailing address is P.O. Box 1916, Camdenton, Missouri 65020. Michaele McDuffey and Michael McDuffey are the owners of this property located in Camden County, Missouri, in Township 38N, Range 17W, Sections 3 and 10.
2. On March 2, 2012, Summit Natural Gas of Missouri, Inc. (SNGMO) filed an application for a certificate of convenience and necessity authorizing it to construct and maintain a gas system to provide service in Benton, Morgan, Camden and Miller Counties in Missouri. On March 6, 2012, the Commission issued an *Order Directing Notice and Setting Deadline for Intervention Requests* and set a deadline for intervention of April 5, 2012.
3. Michaele McDuffey seeks intervention because according to the application by Summit Natural Gas of Missouri, Inc., “SNGMO will utilize a 6” steel main line to bring gas to this area.” This 6” steel line will lie on the property owned by Michaele and Michael McDuffey. This is the same property on which they reside, and the length of the proposed steel line on the property would be approximately 2500 feet. The interest of Michaele McDuffey is different from that of the general public and cannot be represented adequately by any other party to this proceeding.
4. Michaele McDuffey’s application to intervene is being filed after the deadline for intervention (4 CSR 240-2.075 (10)) because she was first given notice that an application had been filed by SNGMO in a letter received from Summit Natural Gas of Missouri, Inc. This letter was postmarked May 10, 2012, well past the deadline for intervention. This application to intervene is being filed within 30 days of gaining knowledge of the application filed by SNGMO for a certificate of convenience and necessity.

WHEREFORE, for the foregoing reasons, Michaele McDuffey respectfully requests that the Commission grant her Application to Intervene and allow her to become party to this proceeding.

Respectfully submitted,

 Michaele McDuffey

P.O. Box 1916

337 Elephant Rock Road

Camdenton, MO 65020

573 873-5548

mtmcduffey@yahoo.com

Dated: June 4, 2012

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing document was served either by electronic means, or by U.S. mail, postage prepaid, this 4th day of June, 2012 addressed to all parties by their attorneys of record as shown below:

Missouri Public Service Commission

General Counsel Office

P.O. Box 360

200 Madison Street, Suite 800

Jefferson City, MO 65102

[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)

Office of the Public Counsel

Lewis Mills

P.O. Box 2230

200 Madison Street, Suite 650

Jefferson City, Mo 65102

[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Missouri Public Service Commission

Bob Berlin

P.O. Box 360

200 Madison Street, Suite 360

Jefferson City, MO 65102

[bob.berlin@psc.mo.gov](mailto:bob.berlin@psc.mo.gov)

Summit Natural Gas of Missouri, Inc.

Dean L. Cooper

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102-0456

[Dcooper@brydonlaw.com](mailto:Dcooper@brydonlaw.com)



Michaele McDuffey, Applicant