

ORIGINAL

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November 29, 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

FILED²

NOV 29 1999

Missouri Public
Service Commission

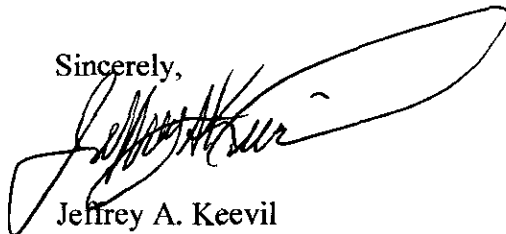
RE: Case No. GM-2000-312
In the Matter of the Joint Application of Atmos Energy Corporation and Arkansas
Western Gas Company, d/b/a Associated Natural Gas Company

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and fourteen (14) copies of an APPLICATION TO INTERVENE on behalf of the International Brotherhood of Electrical Workers, Local Union No. 1439 ("IBEW Local 1439").

Copies of this filing have on this date been mailed or hand-delivered to counsel listed in the Commission's Order and Notice issued herein on November 8, 1999. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er
Enclosures

cc: counsel listed in November 8, 1999 Order

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

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Missouri Public
Service Commission

In the Matter of the Joint Application of)
Atmos Energy Corporation and Arkansas)
Western Gas Company, d/b/a Associated)
Natural Gas Company, for an Order)
Authorizing the Sale and Transfer of Certain)
Assets of Associated Natural Gas Company)
Located in Missouri to Atmos Energy)
Corporation and Either Authorizing the)
Transfer of Existing Certificates of Public)
Convenience and Necessity or Granting a)
New Certificate of Public Convenience)
and Necessity to Atmos Energy Corporation)
in Conjunction with Same.)

Case No. GM-2000-312

**APPLICATION TO INTERVENE OF INTERNATIONAL BROTHERHOOD
OF ELECTRICAL WORKERS, LOCAL UNION NO. 1439**

COMES NOW the International Brotherhood of Electrical Workers, Local Union No. 1439 ("IBEW Local 1439"), affiliated with A.F.L.-C.I.O., pursuant to 4 CSR 240-2.075 and the Commission's Order and Notice ("Order") issued herein on November 8, 1999, and in support of its Application to Intervene respectfully states as follows:

1. In the Order, the Commission stated that interested parties would have until "on or before November 29, 1999" to file applications to intervene. This Application to Intervene is therefore being timely filed.

2. IBEW Local 1439 is a labor organization as defined in the National Labor Relations Act, as amended. IBEW Local 1439 represents the outside physical employees of Associated Natural Gas Company ("ANG"), one of the Joint Applicants in this case, as certified by the National Labor Relations Board. The members of IBEW Local 1439

which are covered by the current Labor Agreement with ANG are based in several locations throughout Missouri and northeastern Arkansas.

3. The ANG employees represented by IBEW Local 1439 may be affected by orders entered by the Commission in this proceeding and, accordingly, IBEW Local 1439 and the employees it represents are interested in this proceeding.

4. Because IBEW Local 1439 and the employees it represents may be directly affected by the Commission's decisions and orders in this case, IBEW Local 1439 and the employees it represents have 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 intervention of IBEW Local 1439 will serve the public interest because it will ensure that the rights of the employees represented by IBEW Local 1439 are protected.

5. While IBEW Local 1439 does not currently have sufficient information to support or oppose the Joint Application which initiated this proceeding, IBEW Local 1439 is concerned that decisions or orders of the Commission herein could adversely affect the work opportunities, employment security and various terms and conditions of employment of the ANG employees represented by IBEW Local 1439, and is also concerned with the potential detriment to customers in the event that the Joint Application is approved and Atmos Energy Corporation reduces its workforce or combines locations. IBEW Local 1439 does not currently have sufficient information to support or oppose the Joint Application in part because to date, after several requests from IBEW Local 1439, IBEW Local 1439 has not had the opportunity to meet with

representatives of the Joint Applicants in order to better understand the intent of management when, or if, the sale which is the subject of this proceeding is approved.

6. IBEW Local 1439 submits that it meets the criteria for intervention set forth in 4 CSR 240-2.075 and, accordingly, that its Application to Intervene should be granted. IBEW Local 1439 would also note that the Commission has previously granted intervention to local unions in Commission cases on grounds substantially similar to those set forth herein.

7. The name and address of IBEW Local 1439 is as follows:

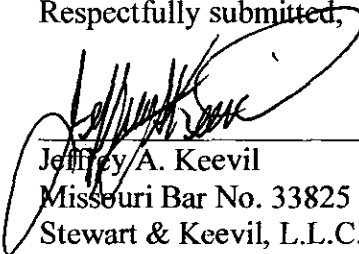
International Brotherhood of Electrical Workers
Local No. 1439
Michael D. Walter, Business Representative
2121 59th Street
St. Louis, Missouri 63110
Tel: (314) 644-6111
Fax: (314) 644-6736

8. IBEW Local 1439 requests that service of all pleadings, correspondence, communications and orders and decisions of the Commission be made to IBEW Local 1439 at the address shown in paragraph 7 above and to counsel as follows:

Jeffrey A. Keevil
Stewart & Keevil, L.L.C.
Cherry Street Centre
1001 Cherry Street, Suite 302
Columbia, Missouri 65201
Tel: (573) 499-0635
Fax: (573) 499-0638

WHEREFORE, having stated its grounds for intervention, IBEW Local 1439 moves that the Commission enter an order granting it intervenor status as a full party in this case in its behalf and on behalf of the employees it represents.

Respectfully submitted,



Jeffrey A. Keevil

Missouri Bar No. 33825

Stewart & Keevil, L.L.C.

1001 Cherry Street, Suite 302

Columbia, Missouri 65201

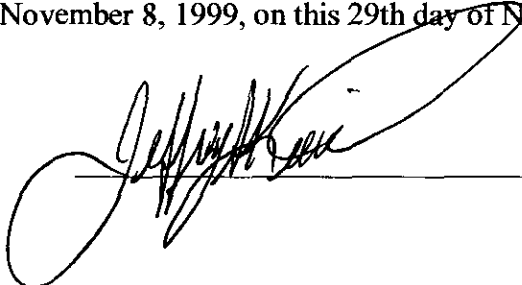
(573) 499-0635

(573) 499-0638 (fax)

ATTORNEY FOR INTERNATIONAL
BROTHERHOOD OF ELECTRICAL
WORKERS, LOCAL UNION NO. 1439

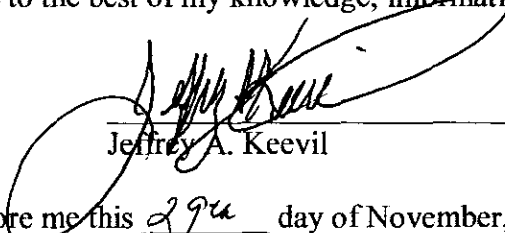
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by placing same in first-class mail with proper postage affixed, or by hand delivery, to counsel listed in the Commission's Order and Notice dated November 8, 1999, on this 29th day of November, 1999.



State of Missouri)
)
County of Boone) ss.

I, Jeffrey A. Keevil, being first duly sworn verify that I: am an attorney for the International Brotherhood of Electrical Workers, Local Union No. 1439 ("IBEW Local 1439"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing Application to Intervene on behalf of IBEW Local 1439; and that the statements contained therein are true to the best of my knowledge, information and belief.



Jeffrey A. Keevil

Subscribed and sworn to before me this 29th day of November, 1999.



Notary Public

My Commission expires: 5/8/2000

