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May 26, 2000

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

**FILED<sup>2</sup>**

MAY 26 2000

RE: Case No. GR-2000-425  
Missouri Gas Energy

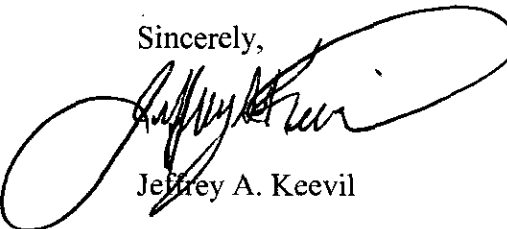
Missouri Public  
Service Commission

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<sup>2</sup>  
MAY 26 2000  
Missouri Public  
Service Commission

In the Matter of Missouri Gas Energy's )  
Purchased Gas Cost Adjustment tariff ) Case No. GR-2000-425  
revisions to be reviewed in its 1999-2000 )  
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 case<sup>1</sup>. 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

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<sup>1</sup> 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. This matter is currently on appeal in the Missouri Court of Appeals, which is an appeal of Commission rulings in Case No. GR-96-450.

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 the case will not be the subject of Staff review until the conclusion of the 1999-2000 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 MGE proceedings by granting intervention to KPC and/or its predecessors in MGE's last two general rate increase cases, Case No. GR-96-285 and GR-98-140, as well as 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 and GR-99-304).

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)

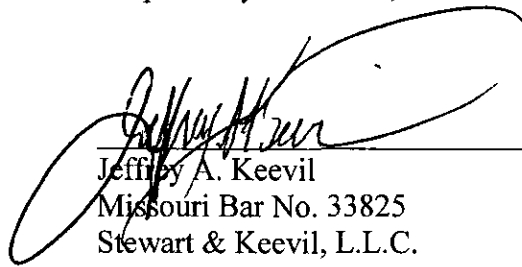
(713) 653-6710 (fax)

with a copy to the following:

Lou Marinos  
President  
8325 Lenexa Dr., Suite 400  
Lenexa, Kansas 66214

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.

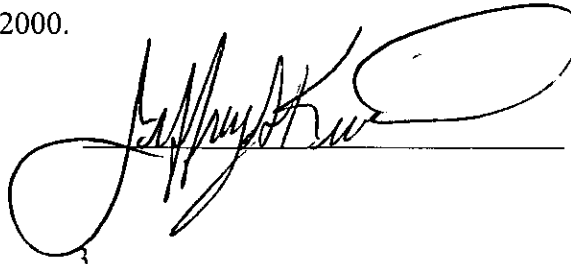
Respectfully submitted,



Jeffrey A. Keevil  
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ATTORNEY FOR KANSAS  
PIPELINE COMPANY

**CERTIFICATE OF SERVICE**

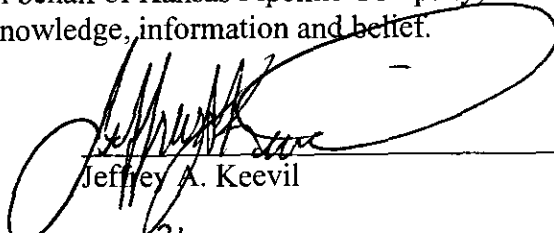
I hereby certify that a copy of the foregoing pleading was delivered by first-class mail, or hand-delivery, to Robert J. Hack, counsel for Missouri Gas Energy; the Office of the Public Counsel; and the General Counsel's Office of the Missouri Public Service Commission on this 26th day of May, 2000.



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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; am licensed to practice law in the State of Missouri; have been authorized to file the foregoing on behalf of Kansas Pipeline Company; 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 26 day of May, 2000.

  
\_\_\_\_\_  
Notary Public

My Commission expires: Jan 13, 2004

Shawna M. Adams  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Boone County  
My Commission Expires: Jan. 13, 2004

