

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the matter of Missouri Gas Ener-)
gy of Kansas City, Missouri re-)
quested authority to file a tariff) Case No. GR-2006-0422
reflecting a change in rates for)
its Missouri customers)

**APPLICATION FOR ORDER ALLOWING
INTERVENTION OF MIDWEST GAS USERS' ASSOCIATION**

Comes now MIDWEST GAS USERS' ASSOCIATION ("Midwest") and pursuant to 4 C.S.R. 240-2.075 applies to intervene herein and become a party hereto in respect to the above matter. In support thereof, Midwest respectfully states:

1. Midwest is an unincorporated non-profit association consisting of and representing its membership of business concerns and corporations that are substantial users of natural gas at their plants situated in such states as Kansas, Missouri and Oklahoma. Numerous members have plants and facilities which are located in and consume natural gas within the State of Missouri. A listing of Midwest members and participants is attached as Appendix A.^{1/}

^{1/}Pursuant to 4 CSR 240-2.075(3), the attached listing includes Midwest members and companies that have at various times and in various matters participated through Midwest in proceedings in Missouri, Kansas and at the Federal Energy Regulatory Commission. The participants in a particular case will vary depending on the nature of the case, the location and service area of the utility involved, and the impacts on and circumstances of a particular member's or participant's operations. Delays in being able to obtain a full copy of MGE's filing, the prompt-
(continued...)

2. Midwest's interest in proceedings affecting the rates, terms and conditions of large customer natural gas service has been repeatedly recognized by the Missouri Public Service Commission in permitting Midwest's intervention in proceedings affecting The Gas Service Company, its successors, KPL Gas Service Company, Western Resources and Missouri Gas Energy, Aquila, Inc. (Missouri Public Service Company), Ameren Union Electric and in numerous generic dockets involving the terms and conditions of natural gas transportation and purchased gas adjustment clauses for natural gas companies in the State of Missouri. Midwest's interest in proceedings affecting natural gas rates, and the terms and conditions of natural gas service also has been recognized by the Federal Power Commission and its successor the Federal Energy Regulatory Commission in granting Midwest's intervention in numerous Natural Gas Act Section 4 and 5 dockets concerning Williams Natural Gas Pipeline Company (now Southern Star Central), Panhandle Eastern Pipeline Company, Riverside Pipeline (now Enbridge Inc.), and other generic dockets concerning the terms and conditions of natural gas service, including FERC Orders 436, 500, 451, 528, 636 and 637.

^{1/}(...continued)
ness of the suspension order and the resulting early intervention date has prevented a full response from the membership while information is still being circulated. Present participants who have authorized this intervention are EnerSys Inc., ThyssenKrupp Stahl Co., Wire Rope Corporation of America, North Kansas City Hospital, Archer Daniels Midland Corporation, and AAA Uniform Service. Other participants' involvement and authorization is pending and is expected to be drawn from the attached listing. Midwest will seasonably identify these to the Commission and to any other parties.

3. On or about May 2, 2006, Missouri Gas Energy, a Division of Southern Union Corporation (MGE) filed proposed tariffs reflecting an overall annual revenue increase of \$41.6 million for its Missouri service area. Other changes appear to have been proposed in certain other terms and conditions of service that may affect the economics of natural gas transportation for Midwest members and participants.

4. As major customers of MGE, Midwest members and participants will be affected by the outcome of this case to a material but as yet undetermined extent.

5. Because MGE transports gas for use by Midwest members under separate transportation rate schedules and because of the size and consumption patterns of Midwest's members, Midwest is in the special position of representing interests which will not and cannot be represented adequately by any other party and which interests are direct and immediate and differ from those of the general public. Therefore, it will aid the Commission and protect the public interest that Midwest be permitted to intervene in this proceeding so as to protect interests that no other party is in a position properly to protect and adequately represent.

6. For purposes of 4 CSR 240-2.075(2), Midwest has historically opposed the discriminatory, non-cost-based pricing of natural gas distribution services. Midwest is unable to make a more specific formulation or statement of the positions it will take in the issues in this case pending further review of MGE's

filing, expected discovery and the positions that may be taken by other expected parties to this proceeding.

WHEREFORE, Midwest prays: (a) that Midwest be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR MIDWEST GAS USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein.



Stuart W. Conrad

Dated: June 1, 2006

APPENDIX A

A D Mohr Farms	Friskies Petcare Div. of Nestle' Inc.
Ag Processing Inc a cooperative	Frito Lay
ABB Power T & D Corporation	Folger's Coffee Co.
Alameda Plaza Inc. [Fairmont]	Gaines Foods
Alameda Towers	General Mills
American Bakeries Co.	Griffin Wheel
American Beauty Macaroni	Guardian Management Inc.
Archer Daniels Midland Company	Gulf & Western Mfg.
Ark City Packing Co.	Guys Foods Inc.
Banquet Foods Corporation	Hallmark Cards
Baptist Medical Center	Hamm Asphalt Inc.
Bayer Inc.	Harvest Brand Inc.
Bethany Hospital	Hercules, Inc.
Blueside Company	Hills Pet Food Division
BMA	Hills Division of Riviana
Bowen Construction Co.	Hospital Linen Service
Butler Manufacturing Co.	Hudson Foods, Inc.
Cargill Inc.	Hudson Farms
Carnation Can Co.	Hudson Food Protein
Castlegate Ind. Inc.	ICI Explosives USA, Inc.
Certain-Teed Products Inc.	J C Nichols Co.
Chesebrough-Ponds, Inc.	Kansas City Terminal Railway
City of Osborne	Koppers Co. Inc.
City of Holton	Krause Milling Co.
City of Minneapolis	Lafarge Corporation
City of Independence, Missouri	Lawrence Paper Company
City of Palmyra	Leggett & Platt Inc.
City of Ottawa	M F A Milling
City of Beloit	M K T Railroad
City of Baldwin	Hoeschst Marion Roussel
City of Ossawatomie	[Quintiles]
City of Sabetha	Maytag Corporation
City of Horton	McNally Pittsburg
City of Lincoln	Medical Center of Independence
City of Augusta	Menorah Medical Center
Coleman Alfalfa	Mid America Dairymen
Colgate Palmolive	Midwest Conveyor
Continental Baking Company	Midwest Grain Products
Cook Paint & Varnish	Milnot Compay
Corn Products Company	Mission Clay Products
Danisco Cultor, Inc.	Missouri Steel Castings
Doanes Products	Missouri Plating Co.
Empire Cold Storage	Modine Manufacturing Company
Fairbanks Morse Pump	National Starch Company
Fairbanks Morse & Co.	National ByProducts
Fairmont C. C. Dairy	North Kansas City Hospital
Fasco Products, Inc.	O'Sullivan Industries
Faultless Laundry	Owens Corning Fiberglas
Ford Motor Co.	PCS Nitrogen Co.
Fox Run Apartments	Pet Milk Co.
	Philadelphia Quartz Co.

Pittsburgh Corning Corporation
Proctor & Gamble Co.
Potash Corporation
Quaker Oats
Ralston Purina Co.
Reichhold Chemical Inc.
Research Hospital and Medical
Center
Reynolds Metals Co.
Rival Manufacturing Co.
Safeway Stores
Santa Fe Railroad
Sealright Mfg. Co.
Sears Roebuck & Co.
Seitz Foods Inc.
Southwest Oil & Grease
Sperry Vickers
St. John's Hospital
St. Joseph Light & Power
St. Joseph's Center
St. Francis Hospital
St. Mary's Hospital, St. Jo-
seph, Missouri
St. Joseph's Hospital
St. Lukes Hospital
Standard Refining
Steffen Dairy
Swift and Company
Swift Ind. Packing Co.
Teva Pharmaceuticals, Inc.
Thomas J. Lipton Inc.
Thompson Industries
ThyssenKrupp Stahl Co.
Tower Metal Products
Town of Carrolton
TransWorld Airlines [American
Airlines]
Trigen - Kansas City District
Trinity Lutheran Hospital
Trumbull Asphalt
U S Gypsum Co.
Vance Brothers Asphalt
W R Grace & Co.
W S Dickey Clay Products Co.
Wells Aluminum Inc.
Winchester Foods Inc.
Wire Rope Corporation of Amer-
ica