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February 4, 1999

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

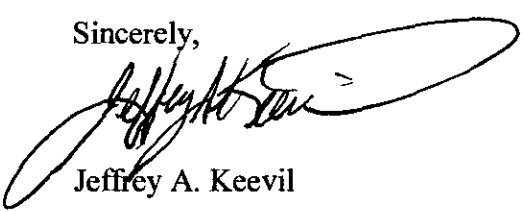
RE: In the Matter of Missouri Gas Energy
Case No. GR-99-304

Dear Mr. Roberts:

Enclosed for filing are an original and fourteen (14) 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 for parties of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er

Enclosures

cc: counsel for parties of record

FILED
FEB 4 1999
Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
FEB 4 1999
Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment factors) Case No. GR-99-304
to be reviewed in its 1998-1999)
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 docket 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").

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 docket¹. 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 the docket has only recently been opened and will not be the subject of Staff review until

¹ 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 review in the Cole County Circuit Court, which is a review of Commission rulings in Case No. GR-96-450.

the conclusion of the 1998-1999 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 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, KPC is a successor in interest to Riverside Pipeline Company, L.P. ("Riverside") and Mid-Kansas Partnership ("Mid-Kansas") and the Commission has previously recognized the standing of Mid-Kansas/Riverside to intervene in MGE proceedings by granting intervention to Mid-Kansas/Riverside 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 and GR-98-167).

4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

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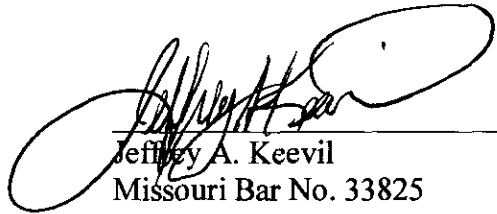
Tino Monaldo
335 North Washington, Suite 130
Corporate Square
P.O. Box 728
Hutchinson, Kansas 67504-0728
(316) 669-9338
(316) 665-5961 (fax)

with a copy to the following:

Howard E. Lubow
Executive Vice-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,



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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 and Gary W. Duffy, 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 4th day of February, 1999.

