

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Union Electric Company)	
d/b/a AmerenUE for Authority to File Tariffs)	
Increasing Rates for Natural Gas Service)	Case No. GR-2010-0363
Provided to Customers in the Company's)	
Missouri Service Area.)	

MoGAS PIPELINE LLC'S RESPONSE
TO AMERENUE'S MOTION FOR RECONSIDERATION
OF ORDER GRANTING APPLICATION TO INTERVENE

COMES NOW MoGas Pipeline LLC ("MoGas") and pursuant to 4 CSR 240-2.080(15) and for its Response to AmerenUE's Motion for Reconsideration of Ordering Granting Application to Intervene filed on August 5, 2010, states:

1. AmerenUE's Motion for Reconsideration is essentially a re-argument of its Opposition to MoGas' Application to Intervene filed on July 12, 2010, and rejected by this Commission in its Order Granting Application to Intervene issued July 28, 2010.

2. AmerenUE suggests that MoGas be granted intervention conditionally and for limited purposes only. There is no provision under the Commission Rules on Interventions (4 CSR 240-2.075) nor is there any precedent for "conditional" or "limited intervention".

3. Ameren UE suggests that MoGas be granted leave to file an "amicus curiae" brief and cites to the provision of the Rules 4 CSR 240-2.075(6), but MoGas did not petition such status.

4. MoGas' intervention in this case was not done to impede or obstruct AmerenUE's rate case nor was it done to seek any leverage or unfair advantage. AmerenUE's speculations are just that.

5. MoGas has participated cooperatively and constructively in the prehearing conferences and other proceedings to date and MoGas intends to continue to participate as a responsible and interested intervenor.

WHEREFORE, MOGas respectfully requests that the Commission deny AmerenUE's Motion for Reconsideration.

Respectfully submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Leland B. Curtis

Leland B. Curtis, #20550
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)
lcurtis@lawfirmemail.com

Attorneys for MoGas Pipeline, LLC

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing documents was either faxed, emailed, or mailed by U.S. Mail postage paid this 13th day of August, 2010, to the following:

General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov

Office of Public Counsel
200 Madison Street, Suite 650
P.O.Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

Eric Dearmont
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, Mo 65102
eric.dearmont@psc.mo.gov

Sarah Mangelsdorf
Missouri Department of Natural Resources
207 Wes High Street
P.o. Box 899
Jefferson City, MO 65102
sarah.mangelsdorf@ago.mo.gov

Mary Ann Young
Missouri Department of Natural Resources
1101 Riverside Drive, 4th Floor East, Room 456
P.O. Box 176
Jefferson City, MO 65102
maryann.young@dnr.mo.gov

Dean Cooper
Union Electric Company
312 East Capitol
P.O. Box 456
Jefferson City, MO 65102
dcooper@brydonlaw.com

Steven Sullivan
Union Electric Company
1901 Chouteau Ave.
P.O.Box 66149 (MC 1300)
St. Louis, MO 63166
AmerenUEService@ameren.com

Wendy Tatro
Union Electric Company
1901 Chouteau Ave.
St. Louis, MO 63166-6149
AmerenUEService@ameren.com

/s/ Leland B. Curtis
