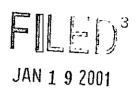
## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI



In the Matter of the Emergency	,	Service Commission
PGA Rate Missouri Gas Energy	)	Case No. GR2001-382
Case	)	

## **APPLICATION TO INTERVENE**

**COMES NOW** the City of Joplin, pursuant to 4 CSR 240-2.075 of the Rules of Practice and Procedure, and for its Application to Intervene states:

- 1. The City of Joplin is a municipality located in Jasper County and it receives natural gas from Missouri Gas Energy Company (hereinafter Missouri Gas).
- 2. Correspondence, communications, orders and decisions in this matter should be addressed to:

James B. Deutsch Henry T. Herschel Blitz, Bardgett & Deutsch, L.C. 308 East High Street, Suite 301 Jefferson City, MO 65101 Telephone No.: (573) 634-2500 Facsimile No.: (573) 634-3358

- 3. Missouri Gas is a corporation with its principle office and place of business located in Missouri. Missouri Gas is a gas corporation as defined in Section 386.020(16), RSMo, and as such is subject to the jurisdiction, supervision and control of the Commission for the distribution and sale of gas in certain portions of the State of Missouri, including portions of Jasper County.
- 4. On approximately January 9, 2001, Missouri Gas filed a request seeking an increase in gas rates, including the rates paid by the City of Joplin, its residents and businesses. The resulting final Report and Order or any other action of the Commission in this case may adversely affect the

City of Joplin, its residents and businesses.

- 5. The City of Joplin is opposed to an increase in gas rates because there has been no showing that it is necessary and such a large rate increase would provide a great financial hardship to the citizens, businesses and the City of Joplin itself.
- 6. The City of Joplin would potentially provide needed testimony and possible expert testimony concerning the impact that this rate increase would have on economic growth and the stability of the citizens, businesses and the City of Joplin itself.
  - 7. The granting of the proposed intervention would serve the public interest.
  - 8. This Application to Intervene has been filed in a timely manner.

WHEREFORE, for the foregoing reasons, the City of Joplin Intervenors respectfully request that the Commission grant their Application to Intervene in this matter.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

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Suite 301

Jefferson City, MO 65101

Telephone No.: (573) 634-2500 Facsimile No.: (573) 634-3358 Attorneys for City of Joplin

-2-

## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the above and foregoing document were sent U.S. Mail, postage prepaid, to the following parties of record on this 19th day of January, 2001:

Robert J. Hack, Vice President Pricing and Regulatory Affairs Missouri Gas Energy 3420 Broadway Kansas City, MO 64111

Mr. Tim Schwartz Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360 Michael R. Noack, Manager Pricing and Regulatory Affairs Missouri Gas Energy 3420 Broadway Kansas City, Missouri 64111

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102-7800

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