

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

In the Matter of the Application of KCP&L)
Greater Missouri Operations Company for) Case No. ER-2010-0356
Approval to Make Certain Changes in its)
Charges for Electric Service)

MISSOURI GAS ENERGY’S APPLICATION TO INTERVENE

COMES NOW Missouri Gas Energy (“MGE”), an operating division of Southern Union Company (“Southern Union”), by counsel and pursuant to 4 CSR 240-2.075, and for its application to intervene in the above-captioned proceeding, respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. Southern Union is a Delaware corporation and conducts business in Missouri through its MGE operating division. Through MGE, Southern Union is a “gas corporation” and “public utility” as those terms are defined in RSMo. §386.020, and, as such, is subject to jurisdiction of the Commission as provided by law.

2. MGE’s principal Missouri office is located at 3420 Broadway, Kansas City, Missouri, 64111.

3. Other than cases that have been docketed at the Commission, MGE has no pending action or final unsatisfied judgments against it from any state or federal agency or court within the past three years that involve customer service. MGE has no annual report or assessment fees that are overdue.

4. Communications relating to this application and proceeding should be directed to the undersigned counsel and the following:

Michael R. Noack
Director, Pricing and Regulatory Affairs
Missouri Gas Energy
3420 Broadway
Kansas City, Missouri 64111

816-360-5560
Fax: 816-360-5536
E-mail: mike.noack@sug.com

5. On June 4, 2010, KCP&L Greater Missouri Operations Company (“KCPL GMO”) submitted to the Commission proposed tariff sheets intended to implement a general rate increase for electrical service provided by KCPL GMO in its Missouri service area.

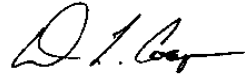
6. By the Commission’s Order and Notice issued June 11, 2010, the Commission directed that applications for intervention be filed by July 1, 2010.

7. MGE should be allowed to intervene in this proceeding, because MGE has an interest that is different from that of the “general public” that may be adversely affected by a final order in this case and because granting intervention to MGE would serve the public interest. As a provider of natural gas service in a territory which substantially overlaps the territory in which KCPL GMO provides electric service, MGE competes with KCPL GMO for business opportunities. Consequently, MGE’s interest in this proceeding relates primarily to issues in the areas of class cost-of-service, rate design, and rules of service. MGE’s status as a Missouri public utility and MGE’s direct specific interests in the subjects of this proceeding indicate that its intervention would serve the public interest.

8. MGE has not yet had an opportunity to review KCPL GMO’s filing in detail and, as such, cannot yet state precisely what its position is in this proceeding. Upon further review of KCPL GMO’s filing, updates, and discovery responses, MGE will be able to state its position in this matter. A detailed statement of position and identification of issues with respect to KCPL GMO’s application may be submitted by MGE in accordance with the procedural schedule.

WHEREFORE, for the reasons stated herein, MGE respectfully requests that the Commission issue an order permitting it to intervene in this case with full rights as a party hereto.

Respectfully submitted,



Dean L. Cooper MBE #36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
Phone: (573) 635-7166
Fax: (573) 634-3847
dcooper@brydonlaw.com

Todd J. Jacobs MBE #52366
Senior Attorney
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111
816-360-5976
816-360-5903 (fax)
Todd.Jacobs@sug.com

ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 30th day of June, 2010, to:

Nathan Williams
Missouri Public Service Commission
Governor's Office Building
200 Madison Street
P.O. Box 360
Jefferson City, Missouri 65102
nathan.williams@psc.mo.gov

Lewis Mills
Governor's Office Building
200 Madison Street
P.O. Box 7800
Jefferson City, Missouri 65102
lewis.mills@ded.mo.gov

Stuart Conrad
Finnegan, Conrad & Peterson, LC
3100 Broadway, Suite 1209
Kansas City, MO 64111
stucon@fcplaw.com

Carl Lumley
130 S. Bemiston, Ste 200
St. Louis MO 63105
clumley@lawfirmemail.com

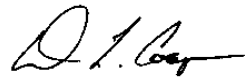
Thomas M. Byrne
Ameren Services Company
1901 Chouteau Ave.
P.O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
tbyrne@ameren.com

Mark Comley
Newman, Comley & Ruth P.C.
P.O. Box 537
Jefferson City, MO 65102
comleym@ncrpc.com

Karl Zobrist
Sonnenschein Nath &
Rosenthal LLP
4520 Main Street, Suite 1100
Kansas City, MO 64111
kzobrist@sonnenschein.com

James M. Fischer
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101
jfischerpc@aol.com

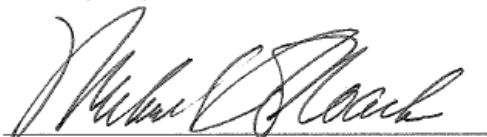
James B. Lowery
111 South Ninth Street, Suite 200
P.O. Box 918
Columbia, MO 65205-0918
lowery@smithlewis.com



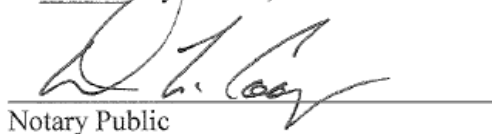
VERIFICATION

STATE OF MISSOURI)
)
COUNTY OF COLE) ss

I, Michael R. Noack, state that I am employed by Missouri Gas Energy (MGE), a division of Southern Union Company, as Director of Pricing and Regulatory Affairs; that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of MGE.



Subscribed and sworn to before me this 30th day of June, 2010.



Notary Public

My Commission Expires:

Dean L. Cooper
Notary Public-Notary Seal
State of Missouri
County of Cole
Commission # 07433496
My Commission Expires Mar. 3, 2011