

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

In the Matter of The Empire District	)	
Company of Joplin, Missouri	)	
For Authority to File Tariffs Increasing	)	File No. ER-2012-0345
Rates for Electric Service Provided to	)	
Customers in the Missouri Service Area of	)	
the Company	)	

**SOUTHERN UNION COMPANY'S APPLICATION FOR LEAVE TO INTERVENE**

COMES NOW Southern Union Company ("Southern Union") d/b/a Missouri Gas Energy ("MGE"), by and through counsel, pursuant to 4 CSR 240-2.075, and for its application for leave to intervene in the above-captioned proceedings, 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 the fictitious name Missouri Gas Energy. 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  
816-360-5560  
Fax: 816-360-5536  
E-mail: [mike.noack@sug.com](mailto:mike.noack@sug.com)

5. On July 6, 2012, The Empire District Electric Company ("Empire") filed tariffs seeking a general rate increase for utility service.

6. By the Commission's Order Directing Notices, Setting Intervention Deadline, Setting Procedural Conference and Directing Filing of Proposed Procedural Schedule issued July 9, 2012, the Commission directed that applications to intervene be filed by July 19, 2012.

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 Empire provides electric service, MGE's services and demand-side efforts are interrelated with those of Empire. Consequently, MGE's interest in this proceeding relates primarily to issues in the areas of class cost-of-service, rate design, demand-side management and rules of service. Further, like Empire, MGE also sustained significant financial impact and customer losses as a result of the May 22, 2011 tornado that struck Joplin, Missouri. 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 does not yet know what issues will arise in this proceeding and, as such, cannot yet state precisely its position. A detailed statement of position and identification of issues with respect to this case 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,

\_\_\_\_\_  
*/s/*

Todd J. Jacobs                  MBE #52366  
Senior Attorney  
Southern Union Company, d/b/a Missouri Gas  
Energy  
3420 Broadway  
Kansas City, MO  
816-360-5976  
816-360-5903 (fax)  
todd.jacobs@sug.com

ATTORNEY FOR SOUTHERN UNION  
COMPANY D/B/A 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 19<sup>th</sup> day of July, 2012, to all known parties of interest upon their respective representatives or attorneys of record as reflected in the records maintained by the Secretary of the Commission.

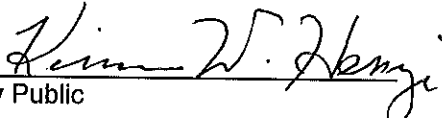
/s/ Todd J. Jacobs

STATE OF MISSOURI            )  
  )  
COUNTY OF JACKSON        )        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.

  
MICHAEL R. NOACK

Subscribed and sworn to before me this 19<sup>th</sup> day of JULY 2012.

  
Notary Public

My Commission Expires: Feb. 22, 2015

