

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

The Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2006-0378
)	
Missouri Pipeline Company, LLC;)	
Missouri Gas Company, LLC; Omega Pipeline)	
Company, LLC, Mogas Energy, LLC;)	
United Pipeline Systems, Inc; and)	
Gateway Pipeline Company, LLC.)	

**APPLICATION OF
SOUTHERN MISSOURI NATURAL GAS
TO INTERVENE**

COMES NOW Southern Missouri Gas Company, L.P. d/b/a Southern Missouri Natural Gas (hereinafter "SMNG"), pursuant to 4 CSR 240-2.075, et seq., and applies to intervene and to become a party herein. In support thereof, SMNG states:

1. Southern Missouri Gas Company, L.P. d/b/a Southern Missouri Natural Gas, a Missouri limited partnership, ("SMNG") owns and operates a natural gas transmission and distribution system located in southern Missouri which serves approximately 7,500 residential, commercial and industrial customers. SMGC is a "gas corporation" and "public utility" under the jurisdiction of the Missouri Public Service Commission, pursuant to Chapters 386 and 393, RSMo. 2000. The Company's street and mailing address is: 301 E. 17th Street, Mountain Grove, Missouri 65711. The Company's telephone number is: (417) 926-7533.

2. All correspondence, pleadings, orders, and documents in this proceeding should be addressed to:

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3. SMNG has no pending actions or final unsatisfied judgments or decisions against them from any state or federal agency or court which involve customer service or rates which has occurred within three (3) years of the date of the Application. No annual reports or assessment fees are overdue in Missouri.

4. On April 4, 2006, the Commission issued its Order Directing Notice And Setting Date For Submission Of Intervention Requests which directed that any entity wishing to intervene in this matter should file an application to intervene not later than May 12, 2006.

5. SMNG has a direct and pecuniary interest in this proceeding that is different from that of the general public. SMNG provides natural gas and transportation services in the south central Missouri in the general area served by Missouri Gas and Missouri Pipeline Company. SMNG is

investigating the possibility of expanding its service areas to include areas that could be served by the intrastate pipeline system owned and operated by Missouri Gas and Missouri Pipeline Company.

As a result, SMNG and its customer may be directly impacted by the outcome of this case.

7. SMNG's participation will aid the Commission in resolving the issues raised in this proceeding. Consequently, SMNG's intervention and participation will promote the public interest.

8. Since there is insufficient information currently available to identify all issues that may arise which will affect SMNG's interests, SMNG reserves its right to state its position and participate with regard to any matter or issue arising in this proceeding.

WHEREFORE, Southern Missouri Gas Company, L.P. d/b/a Southern Missouri Natural Gas respectfully requests that the Commission issue an order authorizing it to intervene in the above-captioned matter.

Respectfully submitted,

/s/ **James M. Fischer**

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ATTORNEYS FOR
SOUTHERN MISSOURI GAS COMPANY, L.P. D/B/A
SOUTHERN MISSOURI NATURAL GAS

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, emailed or mailed, postage prepaid, this 4th day of May, 2006, to counsel on the attached service list.

/s/ James M. Fischer

James M. Fischer

Missouri Public Service Commission

Service List for Case No. GC-2006-0378 Last Updated: 5/2/2006

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