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OF COUNSEL

February 4, 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

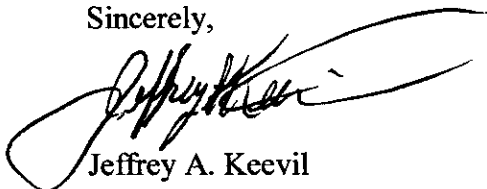
RE: In the Matter of Missouri Gas Energy
Case No. GR-98-167

Dear Mr. Roberts:

Enclosed for filing are an original and fourteen (14) copies of an APPLICATION FOR INTERVENTION on behalf of Kansas Pipeline Company.

Copies of this filing have on this date been mailed or hand-delivered to counsel for parties of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er

Enclosures

cc: counsel for parties of record

FILED
FEB 4 1999
Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
FEB 4 1999
Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)
Purchased Gas Cost Adjustment tariff) Case No. GR-98-167
revisions to be reviewed in its 1997-1998)
Actual Cost Adjustment.)

APPLICATION FOR INTERVENTION

COMES NOW Kansas Pipeline Company ("KPC") and in accordance with 4
CSR 240-2.075, applies to intervene and become a party in the above-referenced docket
and, in support of this Application For Intervention, respectfully states as follows:

1. KPC, a Kansas General Partnership, is a FERC-jurisdictional supplier of
natural gas transportation service in the State of Missouri (Kansas City, Missouri metro
area) to Missouri Gas Energy ("MGE"), a division of Southern Union Company
("Southern Union"). KPC began supplying such service to MGE on or about June 1,
1998.

2. KPC has a direct interest in this proceeding as a supplier of natural gas
transportation service to MGE, since Staff may assert that some of the costs associated
therewith may be subject to review in this docket¹. As such, KPC has an interest in this
proceeding which is different from that of the general public. KPC's predecessors –
Riverside Pipeline Company, L.P. ("Riverside") and Mid-Kansas Partnership ("Mid-
Kansas") – were granted intervention in this proceeding on January 28, 1998; as stated

¹ KPC and its predecessors (Riverside Pipeline Company, L.P. and Mid-Kansas Partnership) believe the
Staff is precluded from reviewing the prudence of the subject contract(s) based upon the Commission-
approved Stipulation in Case Nos. GR-94-101 and GR-94-228. This matter is currently on review in the
Cole County Circuit Court, which is a review of Commission rulings in Case No. GR-96-450.

above, KPC began service to MGE on or about June 1, 1998, during the subject ACA period. Further, the granting of the intervention of KPC will in no way hinder or delay the timely completion of this case, as the Staff has not yet filed its recommendation regarding its review of MGE's 1997-1998 ACA period, and to KPC's knowledge the Commission has not yet set an intervention deadline for this case. While KPC does not currently have sufficient information to take a position herein, KPC is concerned that decisions or orders of the Commission herein could adversely impact it.

3. Because KPC may be directly affected by the Commission's decisions and orders in this case, KPC has a direct interest in this proceeding which is different from that of the general public. Furthermore, granting the proposed intervention will serve the public interest by allowing the input of one of MGE's material transporters to be brought before the Commission. Accordingly, KPC submits that it meets the criteria for intervention set forth in 4 CSR 240-2.075 and that this Application For Intervention should be granted. Furthermore, KPC is a successor in interest to Riverside and Mid-Kansas and the Commission has previously recognized the standing of Mid-Kansas/Riverside to intervene in MGE proceedings by granting intervention to Mid-Kansas/Riverside in MGE's last two general rate increase cases, Case No. GR-96-285 and GR-98-140, as well as numerous ACA proceedings involving MGE and/or its predecessor (GR-93-140, GR-94-101, GR-94-228, GR-95-82, GR-96-78, GR-96-450 and GR-98-167).

4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

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1001 Cherry Street, Suite 302
Columbia, Missouri 65201
(573) 499-0635
(573) 499-0638 (fax)

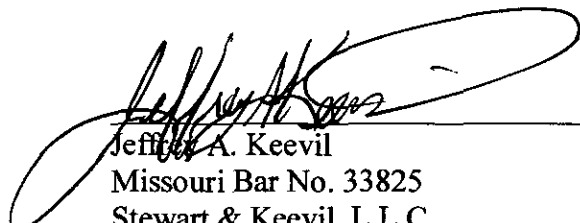
Tino Monaldo
335 North Washington, Suite 130
Corporate Square
P.O. Box 728
Hutchinson, Kansas 67504-0728
(316) 669-9338
(316) 665-5961 (fax)

with a copy to the following:

Howard E. Lubow
Executive Vice-President
8325 Lenexa Dr., Suite 400
Lenexa, Kansas 66214

WHEREFORE, having stated its grounds for intervention, KPC requests the Commission issue its Order granting it leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,

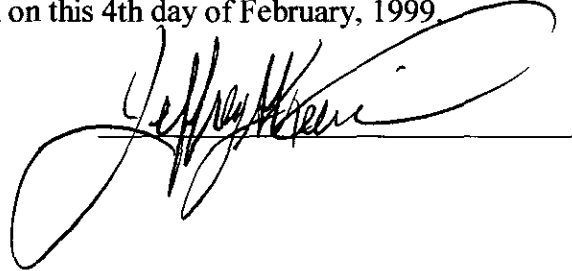


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ATTORNEY FOR KANSAS
PIPELINE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was delivered by first-class mail, or hand-delivery, to Robert J. Hack and Gary W. Duffy, counsel for Missouri Gas Energy; the Office of the Public Counsel; and the General Counsel's Office of the Missouri Public Service Commission on this 4th day of February, 1999.

A handwritten signature in black ink, appearing to read "Jeffrey K. Kline", is written over a horizontal line.