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ALL OTHERS ADMITTED IN KANSAS AND MISSOURI

January 23, 2003

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65102

FILED³
JAN 24 2003

Re: GM-2003-0238

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a Petition of PACE Local 5-348 to Intervene.

This filing has been served by overnight mail to all counsel of record.

Thank you for your attention to this matter.

Very truly yours,

James R. Waers

JRW/nmd
Enclosures

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

JAN 24 2003

Missouri Public
Service Commission

In the Matter of the Application of Southern)
Union Company d/b/a Missouri Gas Energy)
For Authority to Acquire Directly or)
Indirectly, Up to and including One Hundred)
Percent (100%) of the Equity Interests of)
Panhandle Eastern Pipeline Company,)
Including Its Subsidiaries, and to Take All)
Other Actions Reasonably Necessary to)
Effectuate Said Transaction)

Case No. GM-2003-0238

PETITION OF PACE LOCAL 5-348 TO INTERVENE

COMES NOW Local 5-348 of Paper, Allied-Industrial, Chemical and Energy International Union, (hereinafter "PACE"), by and through its attorneys, and respectfully submits its Petition to Intervene in the above-captioned matter. In support of this Petition, and as grounds therefore, PACE states as follows:

1. PACE is a voluntary labor organization doing business and representing employees in the State of Missouri;
2. The name, address, and telephone number of the petitioner seeking leave to intervene is:

Mr. Jesse E. Miller, Jr.
International Representative
PACE International Union
AFL-CIO, CLC
Region VII
2611 South Crenshaw Road
Independence, Missouri 64057
(816) 224-6641

3. Petitioner requests that service be made to petitioner Jesse E. Miller, Jr. of PACE and to petitioner's attorney listed herein;

4. PACE represents employees employed by Panhandle Eastern Pipeline Company. These employees may be affected by any orders entered by the Commission in this proceeding, and PACE and its members are interested in this proceeding. Because PACE and its members may be affected by the Commission's decision in this case, PACE and its members have a direct interest in this proceeding that is different from that of the general public;

5. It is the position of PACE that the requested merger will have an impact on wages, benefits, and terms and conditions of employment of members represented by PACE.

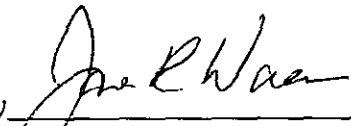
WHEREFORE, having stated the grounds for intervention, and its position and interest in this proceeding, PACE requests that the Commission:

- a. Grant PACE leave to intervene in this proceeding on its behalf and on behalf of its members and to be heard at such time as the Commission may fix; and
- b. In all respects be a party to this proceeding.

Dated this 23rd day of January, 2003.

Respectfully submitted,

BLAKE & UHLIG, P.A.
753 State Avenue
Suite 475
Kansas City, Kansas 66101
(913) 321-8884

By 
James R. Waers, MO Bar #26220

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petition of PACE Local 5-348 to Intervene** was served upon all parties to this action, by causing the same to be sent via United Parcel Service, Next Day Air, this 23rd day of January, 2003, addressed as follows:

James C. Swearengen
Paul A. Boudreau
Sondra B. Morgan
Brydon, Swearengen & England, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, Missouri 65102
UNITED PARCEL SERVICE - NEXT DAY AIR

Office of the Public Counsel
200 Madison Street, Suite 650
Jefferson City, Missouri 65102
UNITED PARCEL SERVICE - NEXT DAY AIR

