

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

|  |   |                       |
|--|---|-----------------------|
| In the Matter of KCP&L Greater Missouri  | ) |                       |
| Operations Company's Application for     | ) |                       |
| Approval of Demand-Side Programs and for | ) | Case No. EO-2012-0009 |
| Authority to Establish a Demand-Side     | ) |                       |
| Programs Investment Mechanism            | ) |                       |

**MISSOURI GAS ENERGY'S APPLICATION TO INTERVENE**

COMES NOW Southern Union Company, d/b/a Missouri Gas Energy ("MGE"), 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  
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5. On December 22, 2011, KCP&L Greater Missouri Operations Company (“GMO”) filed the above titled application.

6. By the Commission’s Order and Notice issued December 23, 2011, the Commission directed that “proper persons should be allowed 20 days” to seek intervention.

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. MGE is a provider of natural gas service in a territory which substantially overlaps the territory in which GMO provides electric service. MGE offers a broad range of demand side programs to consumers as authorized by the Commission in MGE’s last rate case. MGE has a strong interest in supporting appropriate cost and revenue recovery mechanisms for demand side programs. 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 GMO’s filing in detail and, as such, cannot yet state precisely what its position is in this proceeding. Upon further review of 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 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,

/s/

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ATTORNEY 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 to counsel of record this 13th day of January, 2012.

/s/

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Todd J. Jacobs