

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

The Staff of the Missouri Public	)	
Service Commission,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. GC-2006-0491
	)	
Missouri Pipeline Company, LLC; and	)	
Missouri Gas Company, LLC,	)	
	)	
Respondents.	)	

APPLICATION TO INTERVENE

COMES NOW the Municipal Gas Commission of Missouri (“MGCM”) and pursuant to 4 CSR 240-2.075 of the Commission’s Rules of Practice and Procedure applies to intervene herein and become a party hereto for all purposes in respect to the Complaint filed by the Staff of the Missouri Public Service Commission (“Staff”) in the above captioned proceeding. In support of this Application, MGCM respectfully states as follows:

1. MGCM is a statewide municipal joint action agency specifically authorized by Missouri law (Section 393.700 et. seq., RSMo) to operate as a gas utility for the benefit of the combined requirements of its members. The MGCM currently has 14 Missouri municipal natural gas systems as members ranging from approximately 200 to over 74,000 meters. These municipal natural gas systems serve over 82,000 retail customers in the state. The Cities of Richland, St. James, St. Robert and Waynesville, Missouri, entities participating in and supplied natural gas by MGCM, all own and operate municipal gas systems that are captive customers of either Missouri Gas

Company (“MGC”), Missouri Pipeline Company (“MPC”) or both. Both of these entities have been named as Respondents in Staff’s Complaint.

2. Correspondence or communications regarding this application, including service of all notices and orders of this Commission should be addressed to:

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3. MGCM is a governmental entity that purchases natural gas and arranges for its transportation on behalf of its municipal members. As part of these responsibilities and as it applies to this particular case, MGCM has arranged for the transportation of natural gas over the MGC / MPC system for the municipalities of Richland, St. James, St. Roberts and Waynesville. As a result, MGCM and its municipal members may be adversely affected by a final order issued in this case.

4. At this time, MGCM does not have sufficient information to determine what position it will take in this case.

5. MGCM has an interest in this case that differs from that of the general public. MGCM is interested in maintaining reliable pipeline transportation service at a reasonable cost for the benefit of its municipal customers. Finally, MGCM asserts that granting the proposed intervention would serve the public interest.

WHEREFORE, for the reasons stated herein, MGCM respectfully requests that the Commission issue an order permitting MGCM to intervene as a party in this case.

Respectfully submitted,



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**Attorneys for the Municipal Gas
Commission of Missouri**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the forgoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.

A handwritten signature in black ink, appearing to read "David L. Woodsmall", is positioned above a horizontal line. A vertical red line is located to the right of the signature.

David L. Woodsmall

Dated: June 28, 2006