

Missouri Public Utility Alliance

Missouri Association of Municipal Utilities
Municipal Gas Commission of Missouri
Missouri Joint Municipal Electric Utility Commission

2407 W. Ash
Columbia, MO 65203-0045

September 18, 2001

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

RE: In the Matter of the Joint Application of Gateway
Pipeline Company, Inc., Missouri Gas Company,
and Missouri Pipeline Company and the Acquisition by
Gateway Pipeline Company of the Outstanding
Shares of UtiliCorp Pipeline, Inc.
Case No. GM-2001-585

FILED
SEP 18 2001
Missouri Public
Service Commission

Dear Mr. Roberts:

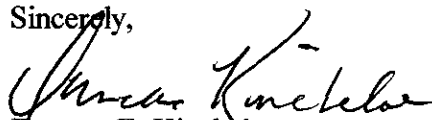
Enclosed for filing in the above-referenced matter are the original and eight (8) copies of:

1. The Request of the Municipal Gas Commission of Missouri, the Cities of Cuba, Richland, St. James, Sullivan, and Waynesville, Missouri and Fidelity Natural Gas, Inc. for Leave to File a Brief as an Amicus Curiae.
2. The Amicus Brief of the Municipal Gas Commission of Missouri, the Cities of Cuba, Richland, St. James, Sullivan, and Waynesville, Missouri and Fidelity Natural Gas, Inc.

Please kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed, self-addressed, stamped envelope.

Thank you for your attention to this matter.

Sincerely,


Duncan E. Kincheloe
General Manager and CEO

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on the following parties of record via U.S. First-Class Mail on this 18th day of September, 2001:

Paul A. Boudreau
Brydon, Swearengen & England, P.C.
312 East Capitol
PO Box 456
Jefferson City, MO 65102-0456

Jeffrey A. Keevil
Stewart & Keevil
1001 Cherry Street, Ste. 302
Columbia, MO 65201

Thomas M. Byrne
AmerenUE
PO Box 66149
1901 Chouteau Avenue
St. Louis, MO 63103

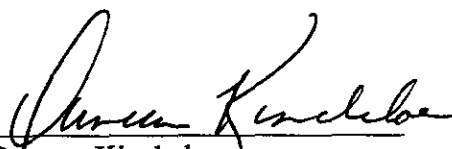
Michael C. Pendergast
Laclede Gas Company
720 Olive Street
St. Louis, MO 63101

Mark W. Comley
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Jefferson City, MO 65102

Mary Ann Young
William D. Steinmeier, P.C.
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Jefferson City, MO 65110

Ruth O'Neill
Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102-7800

Lera L. Shemwell
Office of the General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102


Duncan Kincheloe

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 18 2001

Missouri Public
Service Commission

In the matter of the Joint Application)
of Gateway Pipeline Company, Inc.,)
Missouri Gas Company and Missouri)
Pipeline Company and the Acquisition by)
Gateway Pipeline Company of the Outstanding)
Shares of UtiliCorp Pipeline, Inc.)

Case No. GM-2001-585

**REQUEST OF THE MUNICIPAL GAS COMMISSION OF MISSOURI,
THE CITIES OF CUBA, RICHLAND, ST.JAMES, SULLIVAN, AND
WAYNESVILLE, MISSOURI AND FIDELITY NATURAL GAS, INC.
FOR LEAVE TO FILE A BRIEF AS AN AMICUS CURIAE**

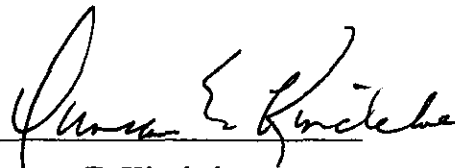
COMES NOW the Municipal Gas Commission of Missouri (MGCM), the Cities of Cuba, Richland, St. James, Sullivan, and Waynesville, Missouri ("the Cities") and Fidelity Natural Gas, Inc., in accordance with 4 CSR 240-2.075 (6), requests for leave to file a brief as an amicus curiae and, in support of this Request, respectfully states as follows:

1. The MGCM is a political subdivision of the State of Missouri, organized as a joint municipal utility commission pursuant to section 393.700 et seq. RSMo., with authority to exercise public powers of a body corporate and politic of the state for the benefit of the inhabitants of municipalities jointly contracting to establish the MGCM. Fourteen Missouri municipalities are current parties to the joint contract establishing the MGCM.
2. The Cities of Cuba, Richland, St. James, and Waynesville, Missouri all own and operate municipal gas systems that are customers of either Missouri Gas Company ("MGC"), Missouri Pipeline Company ("MPC") or both.
3. Fidelity is a pipeline company that provides service to the City of Sullivan that is also a customer of MGC and MPC.
4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

Duncan E. Kincheloe
2407 West Ash Street
Columbia, Missouri 65203
(573) 445-3279
(573) 445-0680 (FAX)

WHEREFORE, having stated its grounds for this request, the MGCM, the Cities, and Fidelity ask the Commission to enter its Request granting leave to file a brief as an amicus curiae in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Duncan E. Kincheloe", written over a horizontal line.

Duncan E. Kincheloe
Missouri Bar No. 25497
2407 West Ash Street
Columbia, Missouri 65203
(573) 445-32379
(573) 445-0680 (FAX)
dkincheloe@mpua.org
Attorney for the Municipal Gas Commission
of Missouri, the Cities of Cuba, Richland,
St. James, Sullivan, and Waynesville,
Missouri and Fidelity Natural Gas, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Application of)
Gateway Pipeline Company, Inc., Missouri)
Gas Company and Missouri Pipeline Company) Case No. GM-2001-585
and the Acquisition by Gateway Pipeline)
Company of the Outstanding Shares of)
UtiliCorp Pipeline Systems, Inc.)

VERIFICATION

The municipality shown below hereby joins in petitioning the Missouri Public Service Commission
for leave to file the brief submitted herewith as an amicus curiae.

City, Town or Village: _____

City of Cuba

By Mayor: _____

John Korh

Date: _____

SEPTEMBER 14, 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Joint Application of)
Gateway Pipeline Company, Inc., Missouri)
Gas Company and Missouri Pipeline Company) Case No. GM-2001-585
and the Acquisition by Gateway Pipeline)
Company of the Outstanding Shares of)
UtiliCorp Pipeline Systems, Inc.)

VERIFICATION

The municipality shown below hereby joins in petitioning the Missouri Public Service Commission
for leave to file the brief submitted herewith as an amicus curiae.

City, Town or Village:

City of Richland

By Mayor:

Lucy Henson
a

Date:

9/14/01

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

In the Matter of the Joint Application of)	
Gateway Pipeline Company, Inc., Missouri)	
Gas Company and Missouri Pipeline Company)	<u>Case No. GM-2001-585</u>
and the Acquisition by Gateway Pipeline)	
Company of the Outstanding Shares of)	
UtiliCorp Pipeline Systems, Inc.)	

VERIFICATION

The municipality shown below hereby joins in petitioning the Missouri Public Service Commission
for leave to file the brief submitted herewith as an amicus curiae.

City, Town or Village: St James, Missouri

By Mayor: W^m J Morrison

Date: 9/17/01

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

In the Matter of the Joint Application of)
Gateway Pipeline Company, Inc., Missouri)
Gas Company and Missouri Pipeline Company)
and the Acquisition by Gateway Pipeline)
Company of the Outstanding Shares of)
UtiliCorp Pipeline Systems, Inc.)

Case No. GM-2001-585

VERIFICATION

The municipality shown below hereby joins in petitioning the Missouri Public Service Commission
for leave to file the brief submitted herewith as an amicus curiae.

City, Town or Village: SULLIVAN

By Mayor: Karen Goddard

Date: 9/13/01

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

In the Matter of the Joint Application of)
Gateway Pipeline Company, Inc., Missouri)
Gas Company and Missouri Pipeline Company) **Case No. GM-2001-585**
and the Acquisition by Gateway Pipeline)
Company of the Outstanding Shares of)
UtiliCorp Pipeline Systems, Inc.)

VERIFICATION

The municipality shown below hereby joins in petitioning the Missouri Public Service Commission
for leave to file the brief submitted herewith as an amicus curiae.

City, Town or Village: CITY OF WAYNESVILLE

By Mayor: LOREL BIGSBY By Yonf Gurley

Date: SEPTEMBER 12, 2001



September 13, 2001

RE: Case No. GM-2001-585

Fidelity Natural Gas, Inc., a privately owned LDC in Sullivan, Missouri, hereby supports the position of the Municipal Gas Commission of Missouri in its Legal Brief submitted herewith to the Missouri Public Service Commission.

A handwritten signature in black ink that reads "Dave Beier". The signature is written in a cursive, flowing style.

Dave Beier
Vice President-Regulatory