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September 29, 2000

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ROBERT SCHALLENBERG
Director, Utility Services

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DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

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

RE: Case No. GS-2001- 2/6

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO OPEN A CASE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Cliff E. Snodgrass
Senior Counsel
(573) 751-3966
(573) 751-9285 (Fax)

CES:sw
Enclosure
cc: Counsel of Record

FILED²

SEP 29 2000 *mh*

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
SEP 29 2000
Missouri Public
Service Commission

In the Matter of Missouri Gas Energy, a)
Division of Southern Union Company,)
Regarding an Incident that Occurred at)
205 East Oak Street, Warrensburg,)
Missouri.)

Case No. GS-2001- 216

MOTION TO OPEN A CASE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) by and through its attorney, and in support of its request to open a case, states as follows:

1. Under Section 393.140 RSMo 1994, the Missouri Public Service Commission (Commission) has authority to establish a case in order to receive information from public utilities under its jurisdiction. Missouri Gas Energy (MGE), a division of Southern Union Company, is a "gas corporation" as defined in Section 386.020(18) (Cum. Supp. 1998) and is a "public utility" subject to the Commission's jurisdiction under Section 386.020(42) (Cum. Supp. 1998).

2. MGE provides natural gas service in Warrensburg, Missouri.

3. On Monday, July 24, 2000, at approximately 2:47 p.m., a flash fire occurred at 205 East Oak Street, Warrensburg, Missouri. As a result of the incident, the house at 205 East Oak Street sustained moderate damage. An occupant of the structure sustained second-degree burns during the fire and required hospitalization. There were no fatalities.

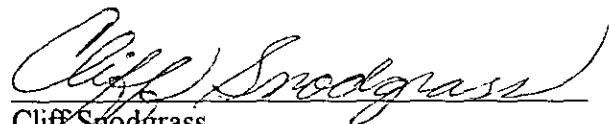
4. The Gas Safety Staff of the Commission has initiated a formal investigation into this matter and the request to open a case is being sought for the purpose of receiving the Gas Incident Report pertaining to the incident investigation.

5. Commission policy as enunciated in IP-2 (Missouri Public Service Commission, Internal Procedures) provides for the opening of a case for the purpose of receiving the Incident Report in connection with the incident's investigation.

THEREFORE, based upon the foregoing, the Staff respectfully requests that the Commission enter an Order establishing a case for the purpose of receiving a Gas Incident Report in connection with this incident.

Respectfully submitted,

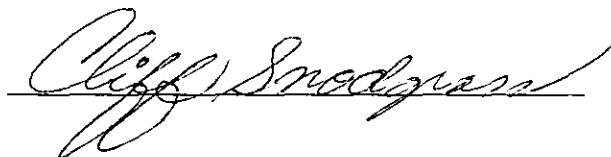
DANA K. JOYCE
General Counsel


Cliff Snodgrass
Senior Counsel
Missouri Bar No. 52302

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 29th day of September, 2000.

A handwritten signature in cursive script, reading "Cliff Snodgrass", is written over a horizontal line.

**Service List for
Case No. GS-2001-____
September 29, 2000**

**Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102**

**Robert J. Hack
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111**