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September 29, 2000

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Jefferson City, MO 65102

FILED³

SEP 29 2000

Missouri Public
Service Commission

RE: Case No. GS-2001- 224

Dear Mr. Roberts:

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

Eric William Anderson
Assistant General Counsel
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EWA/dkf
Enclosure
cc: Counsel of Record

FILED³

SEP 29 2000

Missouri Public
Service Commission

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

In the Matter of Missouri Gas Energy)
regarding an incident at 1426 W. 50th)
Terrace, Kansas City, Missouri on August)
8, 2000.

Case No. GS-2001- 224

MOTION TO OPEN CASE


COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion to Open Case states:

1. The Missouri Public Service Commission ("Commission") has the authority to establish a case for the purpose of receiving information from the public utilities under its jurisdiction pursuant to Section 393.140 RSMo 1994. Missouri Gas Energy ("MGE"), a division of Southern Union Company, is a gas corporation as defined in Section 386.020(18) RSMo (Supp. 1999) and, as such, is a public utility subject to the Commission's jurisdiction pursuant to Section 386.020(42) RSMo (Supp. 1999).
2. MGE provides natural gas service in Kansas City, Missouri.
3. On Tuesday, August 8, 2000, at approximately 4:25 p.m., a natural gas flash fire occurred in an excavation in front of 1426 W. 50th Terrace in Kansas City, Missouri.
4. As a result of the flash fire, two contractor workers working for MGE received burns. One worker was transported to a nearby hospital and was treated for 1st, 2nd, and 3rd degree burns on his face and arms, and was released to recuperate at home. The other worker was severely burned and was transported to the Kansas University Burn Center in Kansas City, Kansas where he remains.
5. Staff has initiated a formal investigation into the incident.

WHEREFORE, the Staff respectfully requests that the Commission open a case for the purpose of receiving information, including a Gas Incident Report, concerning the incident at 1426 W. 50th Terrace, Kansas City, Missouri.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Eric William Anderson
Assistant General Counsel
Missouri Bar No. 47253

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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.



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

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