



MISSOURI GAS ENERGY

3420 Broadway • Kansas City, MO • 64111-2404 • (816) 360-5755

FILED

NOV 20 2000

ROBERT J. HACK

Vice President, Pricing & Regulatory Affairs

November 17, 2000

**Missouri Public
Service Commission**

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
200 Madison Street
Jefferson City, Missouri 65102-0360

RE: Case No. GO-2001-249

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case, please find an original and eight (8) conformed copies of **Missouri Gas Energy's Application to Intervene**.

A copy of this filing has been mailed or hand-delivered this date to counsel of record.

Thank you for bringing this matter to the attention of the Commission. Please call me if you have any questions regarding this matter.

Sincerely,

C: F. Jay Cummings
Service List

Enclosures

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the matter of an investigation into)
Various issues related to Utilicorp United)
Inc.'s gas supply services department.)

Case No. GO-2001-249

MISSOURI GAS ENERGY'S APPLICATION TO INTERVENE

Comes now Missouri Gas Energy, a division of Southern Union Company ("MGE") and for this application to intervene pursuant to 4 CSR 240-2.075 respectfully states the following:

1. MGE is an operating division of Southern Union Company which is duly incorporated under the laws of the State of Delaware, and conducts business under the name of Missouri Gas Energy (the relevant MGE documentation has previously been provided to the Commission in Case No. GM-94-40, and is incorporated herein by this reference). MGE is a "gas corporation" and "public utility" as those terms re defined in Chapter 386 RSMo Supp. 1999 and, as such, is subject to the jurisdiction of the Commission as provided by law. MGE provides natural gas service to approximately 484,000 customers in its service area, which is located primarily in portions of western and west-central Missouri, with its largest metropolitan service area being in Kansas City, Missouri. The address of its principal office is 3420 Broadway, Kansas City, Missouri 64111-2404, (816)360-5755, fax (816)360-5536.

2. This case was established by order of the Commission dated November 9, 2000, in response to the Commission Staff's request. The Staff requested that this case be established for the purpose of conducting an investigation into certain allegations, made by anonymous letter, regarding the operation of the gas supply services department

of Utilicorp United Inc. In particular, the anonymous letter raised issues with respect to the use of financial instruments on natural gas and capacity release practices. Because MGE has made use of financial instruments on natural gas in the past, and may make use of such instruments in the future, and because this case may lead the Commission to make decisions regarding the use of such instruments which may be argued to have precedential effect upon MGE, MGE clearly has a direct and substantial interest in this proceeding, which interest is different from that of the general public and which cannot be adequately represented by any other party.

3. In its Order Establishing Case and Directing Notice dated November 9, 2000, the Commission provided that any interested person wishing to intervene in this case should file an application to intervene no later than November 29, 2000. MGE is unable to state at this time whether it supports or opposes the relief sought by the Staff. However, given MGE's direct interest in this case as set forth above, which may be adversely affected by a final order in this case, MGE submits that it meets the criteria for intervention set forth in 4 CSR 240-2.075, and, accordingly, this application to intervene should be granted.

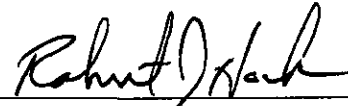
4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to the following:

Michael T. Langston
VP-Gas Supply
Southern Union Company
504 Lavaca, Suite 800
Austin, TX 78701-2939
512/370-8277

Robert J. Hack
VP-Pricing & Reg. Affairs
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111
816-360-5755

Wherefore, Southern Union respectfully requests that the Commission issue its order granting it leave to intervene as a fully party to this case, and for such other and further relief as the Commission may deem proper.

Respectfully submitted,



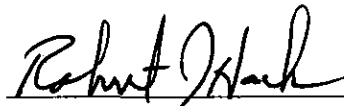
Robert J. Hack MBE #36496
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(816)360-5755
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e-mail: rob.hack@southernunionco.com

ATTORNEY FOR MISSOURI
GAS ENERGY

VERIFICATION

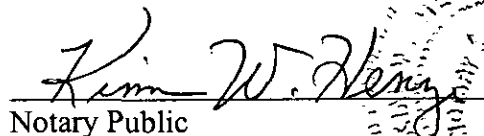
STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, Robert J. Hack, being first duly sworn, verify that I am an attorney for Missouri Gas Energy; I am licensed to practice law in the State of Missouri; I have been authorized to file the foregoing application to intervene on behalf of Missouri Gas Energy; and that the foregoing is correct to the best of my knowledge, information and belief.

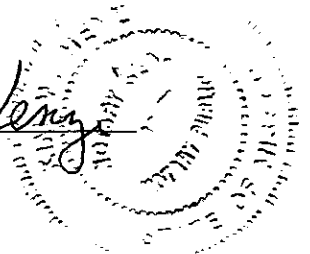


Robert J. Hack

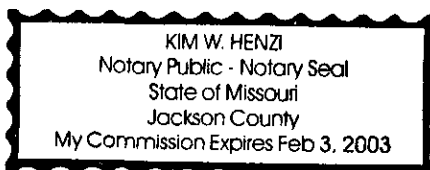
Subscribed and sworn to before me this 17th day of November, 2000.



Notary Public



My Commission expires: _____.



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 12th day of November, 2000.

Robert J. Hark

Service List--GO-2001-249

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

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