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December 12, 2000

FILED²

DEC 13 2000

FEDERAL EXPRESS

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

**Missouri Public
Service Commission**

**Re: Missouri Gas Energy Division of Southern Union
Case No. GR-2001-292**

Dear Mr. Roberts:

Enclosed are the original and eight (8) conformed copies of a pleading, which please file in the above matter and call to the attention of appropriate Commission personnel.

An additional copy of the material to be filed is enclosed, which kindly mark as received and return to me in the enclosed envelope as proof of filing.

Thank you for your attention to this important matter. If you have any questions, please call.

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 
Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties

FILED²

DEC 13 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the matter of Missouri Gas Ener-)
gy of Kansas City, Missouri re-)
quested authority to file a tariff) Case No. GR-2001-292
reflecting a change in rates for)
its Missouri customers)

APPLICATION FOR ORDER ALLOWING
INTERVENTION OF MIDWEST GAS USERS ASSOCIATION

Comes now MIDWEST GAS USERS ASSOCIATION ("Midwest") and pursuant to 4 C.S.R. 240-2.075 applies to intervene herein and become a party hereto in respect to the above matter. In support thereof, Midwest respectfully states:

1. Midwest is an unincorporated non-profit association consisting of and representing its membership of business concerns and corporations which are substantial users of natural gas at their plants situated in such states as Kansas, Missouri and Oklahoma of which numerous members have plants and facilities which are located in and consume natural gas within the State of Missouri. A listing of Midwest members and participants is attached hereto as Appendix A.^{1/}

^{1/}Pursuant to 4 CSR 240-2.075(3), the attached listing includes Midwest members and companies that have at various times and in various matters participated through Midwest in proceedings in Missouri, Kansas and at the Federal Energy Regulatory Commission. Direct participation in a particular case varies depending on the nature of the case, the location and the service area of the utility involved. Present participants in this case are Archer Daniels Midland Company, Lafarge Corporation, the City of Independence, Missouri, TransWorld Airlines and (continued...)

2. Midwest's interest in proceedings affecting the rates, terms and conditions of large customer natural gas service has been repeatedly recognized by the Missouri Public Service Commission in permitting Midwest's intervention in proceedings affecting The Gas Service Company, its successors, KPL Gas Service Company and Western Resources, Missouri Public Service Company, Ameren Union Electric and in various generic dockets involving the terms and conditions of natural gas transportation and purchased gas adjustment clauses for natural gas companies in the State of Missouri. Furthermore, Midwest's interest in proceedings affecting natural gas rates, and the terms and conditions of natural gas service has been recognized by the Federal Power Commission and the Federal Energy Regulatory Commission in granting Midwest's intervention in numerous dockets concerning Williams Natural Gas Pipeline Company and other generic dockets concerning the terms and conditions of natural gas service, including Orders 436, 500, 451, 528, and Orders 636 and 637.

3. On or about November 7, 2000, Missouri Gas Energy, a Division of Southern Union Corporation (MGE) filed proposed tariffs reflecting an overall annual revenue increase of \$39 million for its Missouri service area. Additional changes appear to have been proposed in other terms and conditions of service

^{1/}(...continued)
Leggett & Platt, Inc. Other participants' involvement is pending and is expected to be drawn from the attached listing.

which may affect the ability of Midwest members to economically transport their natural gas supplies through MGE's facilities.

4. As major customers of MGE, Midwest participants will be affected by the outcome of this docket to a material but as yet undetermined extent.

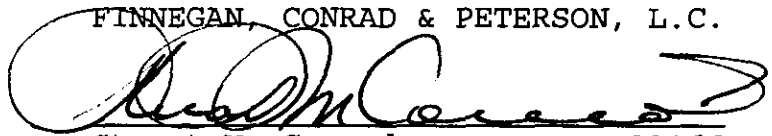
5. Because MGE transports gas for use by Midwest members under separate transportation rate schedules and because of the size and consumption patterns of Midwest's members, Midwest is in the special position of representing interests which will not and cannot be represented adequately by any other party and which interests are direct and immediate and differ from those of the general public. Therefore, it will aid the Commission and protect the public interest that Midwest be permitted to intervene in this proceeding so as to protect its interest which no other party is in a position properly to protect and adequately represent herein.

6. For purposes of 4 CSR 240-2.075(2), Midwest states that it is opposed to the discriminatory pricing of natural gas distribution services and thus expects to oppose the relief in the amount and in the manner and methodology sought herein by MGE. Further, Midwest states that the proposed tariffs have not been shown to be just and reasonable and appear to be unjust and unreasonable. Midwest is unable to make a more specific formulation or statement of the positions it will take in the issues in this case pending further review of MGE's filing and expected discovery.

WHEREFORE, Midwest prays: (a) that Midwest be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR MIDWEST GAS USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein.



Stuart W. Conrad

Dated: December 12, 2000

APPENDIX A

A D Mohr Farms
 A G Processing Inc.
 ABB Power T & D Corporation
 Alameda Plaza Inc.
 Alameda Towers
 American Bakeries Co.
 American Beauty Macaroni
 Archer Daniels Midland Company
 Ark City Packing Co.
 Banquet Foods Corporation
 Baptist Medical Center
 Bayer, Inc.
 Bethany Hospital
 Blueside Company
 BMA
 Bowen Construction Co.
 Butler Manufacturing Co.
 Cargill Inc.
 Carnation Can Co.
 Castlegate Ind. Inc.
 Certain-Teed Products Inc.
 Chesebrough-Ponds, Inc.
 City of Osborne
 City of Holton
 City of Minneapolis
 City of Independence, Missouri
 City of Palmyra
 City of Ottawa
 City of Beloit
 City of Baldwin
 City of Ossawatimie
 City of Sabetha
 City of Horton
 City of Lincoln
 City of Augusta
 Coleman Alfalfa
 Colgate Palmolive
 Continental Baking Company
 Cook Paint & Varnish
 Corn Products Company
 Danisco Cultor, Inc.
 Doanes Products
 Empire Cold Storage
 Fairbanks Morse Pump
 Fairbanks Morse & Co.
 Fairmont C. C. Dairy
 Fasco Products, Inc.
 Faultless Laundry
 Ford Motor Co.
 Fox Run Apartments

Friskies Petcare Division of
 Nestle' Inc.
 Frito Lay
 Folger's Coffee Co.
 Gaines Foods
 General Mills
 Griffin Wheel
 GST Steel Company
 Guardian Management Inc.
 Gulf & Western Mfg.
 Guys Foods Inc.
 Hallmark Cards
 Hamm Asphalt Inc.
 Harvest Brand Inc.
 Hercules, Inc.
 Hills Pet Food Division
 Hills Division of Riviana
 Hospital Linen Service
 Hudson Foods, Inc.
 Hudson Farms
 Hudson Food Protein
 ICI Explosives USA, Inc.
 J C Nichols Co.
 Kansas City Terminal Railway
 Koppers Co. Inc.
 Krause Milling Co.
 Lafarge Corporation
 Lawrence Paper Company
 Leggett & Platt
 M F A Milling
 M K T Railroad
 Hoeschst Marion Roussel
 Maytag Corporation
 McNally Pittsburg
 Medical Center of Independence
 Menorah Medical Center
 Mid America Dairymen
 Midwest Conveyor
 Midwest Grain Products
 Milnot Compay
 Mission Clay Products
 Missouri Steel Castings
 Missouri Plating Co.
 Modine Manufacturing Company
 National Starch Company
 National ByProducts
 North Kansas City Memorial
 Hospital
 O'Sullivan Industries
 Owens Corning Fiberglas

PCS Nitrogen Co.
Pet Milk Co.
Philadelphia Quartz Co.
Pittsburgh Corning Corporation
Proctor & Gamble Co.
Potash Corporation
Quaker Oats
Ralston Purina Co.
Reichhold Chemical Inc.
Research Hospital and Medical
Center
Reynolds Metals Co.
Rival Manufacturing Co.
Safeway Stores
Santa Fe Railroad
Sealright Mfg. Co.
Sears Roebuck & Co.
Seitz Foods Inc.
Southwest Oil & Grease
Sperry Vickers
St. John's Hospital
St. Joseph Light & Power
St. Joseph's Center
St. Francis Hospital
St. Mary's Hospital
St. Joseph, Missouri
St. Joseph's Hospital
St. Lukes Hospital
Stahl Specialty Co.
Standard Refining
Steffen Dairy
Swift and Company
Swift Ind. Packing Co.
Teva Pharmaceuticals, Inc.
Thomas J. Lipton Inc.
Thompson Industries
Tower Metal Products
Town of Carrollton
TransWorld Airlines
Trigen - Kansas City District
Trinity Lutheran Hospital
Trumbull Asphalt
U S Gypsum Co.
Vance Brothers Asphalt
W R Grace & Co.
W S Dickey Clay Products Co.
Wells Aluminum Inc.
Winchester Foods Inc.
Wire Rope Corporation of Amer-
ica, Inc.