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June 6, 2001

Mr. Dale Hardy Roberts
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED²
JUN - 6 2001
Missouri Public
Service Commission

RE: Missouri Gas Energy - Case No. GT-2001-329

Dear Mr. Roberts:

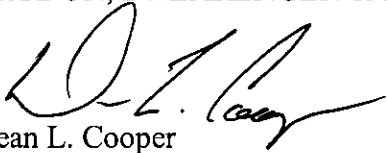
Enclosed for filing in the above-referenced proceeding please find an original and eight copies of MGE's Motion for Leave to Withdraw as Intervenor. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me.
Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


Dean L. Cooper

DLC/rhg
Enclosures
cc: Office of the Public Counsel
Mr. David Meyer, PSC
Mr. Doug Micheel, OPC
Mr. Michael Pendergast
Ms. Diana Vuylsteke
Mr. Jim Fischer/Mr. Larry Dority
Mr. Rob Hack
Mr. Thomas Byrne

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUN - 6 2001
Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Tariff Filing to Implement an)
Experimental Fixed Price Plan and Other)
Modifications to Its Gas Supply Incentive Plan.)

Case No. GT-2001-329

MGE'S MOTION FOR LEAVE TO WITHDRAW AS INTERVENOR

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, and moves the Missouri Public Service Commission ("Commission") for leave to withdraw as an intervenor. In support of its Motion, MGE states as follows:

1. This proceeding was established to address Laclede Gas Company's ("Laclede") Gas Supply Incentive Plan, and proposed modifications thereto. On April 18, 2001, the Staff filed a Motion for Order Permitting Use of Information and for Expedited Treatment ("Staff Motion"). Staff requested that it be permitted to use certain information pertaining to the cost of gas and volumes of gas provided by Missouri local distribution companies on a confidential basis for the limited purpose of performing a cost comparison between Missouri natural gas utilities.

2. On April 24, 2001, MGE filed with the Commission its Application to Intervene and Response to Staff Motion. MGE sought to intervene "in order to both respond to the Staff Motion and to monitor any future proposals that may arise to utilize this information." Additionally, in the circumstance that the Commission agreed to allow the information to be utilized as proposed by Staff, MGE sought "status as an intervenor in order to ensure that its gas supply information is adequately protected from improper disclosure and to ensure that such information and MGE's gas supply operations are placed in appropriate perspective during the course of any Commission review."

3. On May 3, 2001, the Commission used its Order Permitting Use of Certain Information and Order Granting Intervention and Revising Procedural Schedule. This Order, among other things, granted Staff's Motion for Order Permitting Use of Information, as well as MGE's application to intervene. The Staff then filed its testimony using the information obtained from Missouri local distribution companies.

4. On May 15, 2001, Staff filed its Motion for Leave to Withdraw Highly Confidential Schedule and Substitute NP Schedule and Testimony. By this Motion, Staff sought to withdraw and eliminate the disputed local distribution company information from this case. On May 24, 2001, the Commission issued its Order Regarding Staff Motion to Withdraw Highly Confidential Schedule and Substitute Schedule and Testimony wherein it authorized Staff to withdraw the disputed information. Staff filed its substitute pages and schedule on June 4, 2001, eliminating this information.

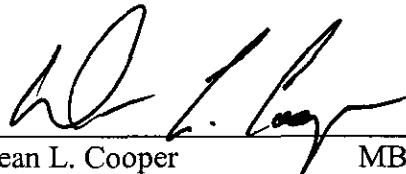
5. As stated in MGE's Application to Intervene, MGE's interest in this proceeding was created by the Staff's Motion for Order Permitting Use of Information because the Staff was proposing to use in this proceeding information and data on the cost of natural gas and the volume of natural gas that had been provided by MGE on a confidential basis.

6. The subsequent withdrawal of this information has left MGE without a direct interest in this case. Therefore, MGE seeks the Commission's leave to withdraw as an intervenor in this matter.

WHEREFORE, MGE respectfully requests the Commission issue an order:

- a) granting MGE's Motion For Leave to Withdraw as Intervenor; and,
- b) granting such further relief as may be reasonable, just and consistent with the relief requested herein.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI GAS ENERGY, A
DIVISION OF SOUTHERN UNION COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on this 6th day of June, 2001, to the following:

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