

STEWART & KEEVIL, L.L.C.

ATTORNEYS AT LAW

SOUTHAMPTON VILLAGE AT CORPORATE LAKE
4603 JOHN GARRY DRIVE
SUITE 11
COLUMBIA, MISSOURI 65203

CHARLES BRENT STEWART
JEFFREY A. KEEVIL

OFFICE (573) 499-0635
FAX (573) 499-0638

January 12, 2005

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Mo. 65102-0360

FILED²

JAN 12 2005

**Missouri Public
Service Commission**

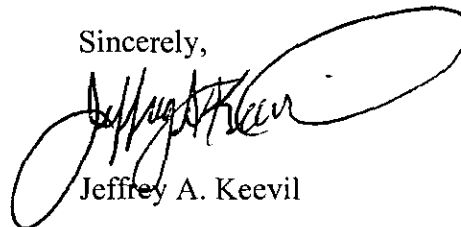
RE: Case No. GR-2005-0169

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case is an original and the appropriate number of copies of an APPLICATION FOR INTERVENTION on behalf of Enbridge Pipelines (KPC).

Copies of this filing have on this date been mailed, hand-delivered, transmitted by facsimile or emailed to counsel for parties of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er

Enclosures

Cc: General Counsel's Office
Office of the Public Counsel
Michael R. Noack
Rob Hack

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

FILED²
JAN 12 2005

**Missouri Public
Service Commission**

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment (PGA) Factors)
To be Audited in Its 2004-2005 Actual Cost)
Adjustment.)
Case No. GR-2005-0169

APPLICATION FOR INTERVENTION

COMES NOW Enbridge Pipelines (KPC) (hereafter "KPC"), and in accordance with 4 CSR 240-2.075, applies to intervene and become a party in the above-referenced case and, in support of this Application For Intervention, respectfully states as follows:

1. KPC, a Kansas general partnership, is a FERC-jurisdictional supplier of natural gas transportation service in the State of Missouri (Kansas City, Missouri metro area) to Missouri Gas Energy ("MGE"), a division of Southern Union Company ("Southern Union"). KPC began supplying such service to MGE on or about June 1, 1998.

2. KPC has a direct interest in this proceeding as a supplier of natural gas transportation service to MGE, since Staff may assert that some of the costs associated therewith may be subject to review in this case. As such, KPC has an interest in this proceeding which is different from that of the general public. No other party to this proceeding can adequately represent the interests of KPC. Further, the granting of the intervention of KPC will in no way hinder or delay the timely completion of this case, as the case has only been recently opened, the Commission has not yet issued an order setting an intervention date in the case, and the ACA period covered by the case is

ongoing. While KPC does not currently have sufficient information to take a position herein, KPC is concerned that decisions or orders of the Commission herein could adversely impact it.

3. Because KPC may be directly and adversely affected by the Commission's decisions and orders in this case, KPC has a direct interest in this proceeding which is different from that of the general public, and which cannot be adequately represented by any other party. Furthermore, granting the proposed intervention will serve the public interest by allowing the input of one of MGE's material transporters to be brought before the Commission. Accordingly, KPC submits that it meets the criteria for intervention set forth in 4 CSR 240-2.075 and that this Application For Intervention should be granted. Furthermore, the Commission has previously recognized the standing of KPC and its predecessors to intervene in these proceedings by granting intervention to KPC and/or its predecessors in numerous ACA proceedings involving MGE and/or its predecessor (*i.e.*, GR-93-140, GR-94-101, GR-94-228, GR-95-82, GR-96-78, GR-96-450, GR-98-167, GR-99-304, GR-2000-425, GR-2001-382, GR-2002-348, GR-2003-0330 and GR-2005-0104).

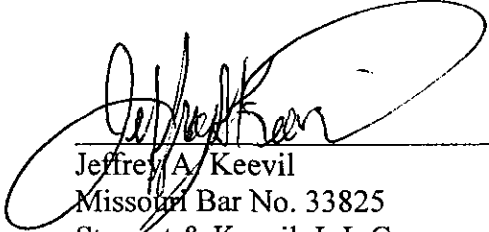
4. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to the following:

Jeffrey A. Keevil
Stewart & Keevil, L.L.C.
4603 John Garry Drive
Suite 11
Columbia, Missouri 65203
(573) 499-0635
(573) 499-0638 (fax)

Chris Kaitson
Associate General Counsel
Enbridge Pipelines (KPC)
1100 Louisiana, Ste. 3300
Houston, Texas 77002
(713) 650-8900
(713) 821-2229 (fax)

WHEREFORE, having stated its grounds for intervention, KPC requests the Commission issue its Order granting it leave to intervene as a full party in this case, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,



Jeffrey A. Keevil
Missouri Bar No. 33825
Stewart & Keevil, L.L.C.
4603 John Garry Drive, Suite 11
Columbia, Missouri 65203
(573) 499-0635
(573) 499-0638 (fax)
per594@aol.com
ATTORNEY FOR ENBRIDGE
PIPELINES (KPC)

VERIFICATION

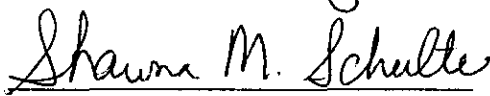
STATE OF MISSOURI)
)
COUNTY OF BOONE) ss

I, Jeffrey A. Keevil, being first duly sworn verify that I: am an attorney for Enbridge Pipelines (KPC) (hereafter "KPC"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing on behalf of KPC; and that the foregoing is correct to the best of my knowledge, information and belief.



Jeffrey A. Keevil

Subscribed and sworn to before me this 10th day of January, 2005.



Shawna M. Schulte

Notary Public

Shawna M. Schulte
Notary Public Notary Seal
State of Missouri
Boone County

My Commission expires: _____
My Commission Expires: May 17, 2008



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail postage paid, by hand-delivery, or by email to counsel for parties of record on this 12th day of January, 2005.

