



**MISSOURI GAS ENERGY**

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

**ROBERT J. HACK**

SENIOR ATTORNEY

August 26, 1998

**FILED**

AUG 27 1998

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
301 W. High Street  
Jefferson City, Missouri 65102

**RE: Case No. OO-99-44**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case, please find an original and fourteen (14) conformed copies of Missouri Gas Energy's Application to Intervene.

Copies of this filing have been mailed or hand-delivered this date to counsel of record.

Please advise if you have questions regarding this matter.

Sincerely,

cc: F. Jay Cummings  
Charles B. Hernandez  
Service List

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

AUG 27 1998

Missouri Public  
Service Commission

In the matter of the assessment against )  
the public utilities in the State of Missouri )  
for the expenses of the Commission for the )  
fiscal year commencing July 1, 1998. )

Case No. OO-99-44

**MISSOURI GAS ENERGY'S APPLICATION TO INTERVENE**

**Comes now** Missouri Gas Energy ("MGE"), by and through counsel, and for its application to intervene pursuant to 4 CSR 240-2.075 respectfully states the following:

1. The legal name of applicant is Missouri Gas Energy, a division of Southern Union Company. MGE is an operating division of Southern Union company which is duly incorporated under the laws of the State of Delaware, and conducts business in Missouri under the name of Missouri Gas Energy. The articles of incorporation of Southern Union Company have previously been provided to the Commission in Case No. GM-94-40. The street and mailing address of MGE's principal office is 3420 Broadway, Kansas city, Missouri 64111.

2. MGE is a public utility engaged in the distribution of natural gas at retail to approximately 470,000 customers in various counties in western Missouri.

3. Correspondence, communications, and orders and decisions of the Commission in this matter should be sent to:

Robert J. Hack  
Senior Attorney  
Missouri Gas Energy  
3420 Broadway  
Kansas City, Missouri 64111  
816/360-5755  
FAX: 816/360-5536

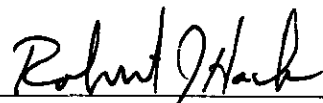
Charles B. Hernandez  
Director, Pricing and  
Regulatory Affairs  
Missouri Gas Energy  
3420 Broadway  
Kansas City, Missouri 64111  
816/360-5605  
FAX: 816/360-5536

4. On July 28, 1998, a number of public utilities initiated this proceeding through the filing of an application for rehearing of Supplemental Order No. 52 in Case No. 11,110. By this order, the Commission fixed the PSC assessments to be paid by public utility companies for the fiscal year beginning July 1, 1998. On August 5, 1998, the Commission set an intervention deadline of August 31, 1998.

5. MGE's current PSC assessment (for the fiscal year commencing July 1, 1998) is approximately 20% greater than its PSC assessment for the immediately preceding fiscal year. As a public utility required to pay the assessments levied by the Commission, MGE is interested in the amount and lawfulness of such assessments. MGE's interest in this matter is therefore different from that of the general public. At this time MGE neither supports nor opposes the relief sought by the applicants for rehearing.

**Wherefore,** MGE respectfully requests that the Commission grant this application to intervene.

Respectfully submitted,



Robert J. Hack MBE #36496  
Senior Attorney  
3420 Broadway  
Kansas City, MO 64111  
(816)360-5755  
FAX: (816)360-5536

ATTORNEY FOR MISSOURI  
GAS ENERGY

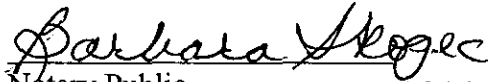
**VERIFICATION**

STATE OF MISSOURI     )  
                                  )  
COUNTY OF JACKSON    )     ss

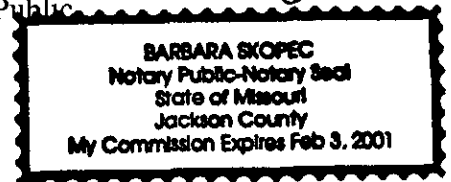
On this 26<sup>th</sup> day of August, 1998, before me appeared Robert J. Hack, Senior Attorney for Missouri Gas Energy, to me personally known, who being by me first duly sworn, states that he is duly authorized to execute Missouri Gas Energy's Application to Intervene and that he has read the above and foregoing Application and believes that the allegations therein are true and correct to the best of his information, knowledge and belief.

  
Robert J. Hack

Subscribed and sworn to before me, a notary public, on this \_\_\_\_\_ day of August, 1998.

  
Notary Public

My Commission expires: February 3, 2001.



**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered this 26<sup>th</sup> day of August, 1998, to:

James C. Swearngen  
Paul A. Boudreau  
Brydon, Swearngen & England  
P.O. Box 456  
Jefferson City, MO 65102-0456

Michael C. Pendergast  
Laclede Gas Company  
720 Olive Street, Room 1520  
St. Louis, MO 63101

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

