

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

In the Matter of the Application of)
Alliance Gas Energy Corporation for a)
Certificate of Public Convenience and)
Necessity Authorizing it to Construct,) **Case No. GA-2007-0168**
Install, Own, Control, Manage and)
Maintain a Natural Gas Distribution)
System to Provide Gas Service in)
Branson, Branson West, Reed's Spring,)
and Hollister, Missouri)

**RESPONSE TO MOTION TO CONSOLIDATE AND APPLICATION TO
INTERVENE**

COMES NOW, the Southern Star Central Gas Pipeline, Inc. ("Southern Star") and for its Response to Motion to Consolidate and Application to Intervene states and alleges as follows:

1. Southern Star is an interstate natural gas pipeline and storage operator with active pipeline operations in Missouri.
2. Southern Star operates that part of its system in Southwestern Missouri in or around Christian, Stone and Taney counties and it is identified as a potential supplier of wholesale gas transportation service to the Alliance Gas Energy Corporation ("AGE") project which is the subject of this docket.
3. On February 21, 2007, the Commission Staff filed a motion to consolidate this case with Case No. GA-2006-0561. Case No. GA-2006-0561 is Ozark Energy Partners, LLC's application for a certificate of convenience and necessity to operate a natural gas distribution system in portions of three southwest Missouri counties. Staff indicates that

the proposed service territories contemplated by the two applications would at least in part overlap. Staff further points out that Southern Star is the only party in Case No. GA-2006-0561 that is not currently a party to this case. Southern Star's failure to intervene in this proceeding was an oversight.

4. Southern Star agrees with Staff that these cases should be consolidated and is therefore requesting permission to intervene in this docket because its interest in this matter are different than that of the general public and which may be adversely affected by the Commission's final order in this case.

5. The representation of Southern Star's interests in this proceeding by any other parties is or may be inadequate.

6. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

Paul S. DeFord
Lathrop & Gage L.C.
2345 Grand Boulevard, Suite 2800
Kansas City, MO 64108
Voice: 816-292-2000
Fax: 816-292-2001
pdeford@lathropgage.com

and to

Tim Thompson
Southern Star Central Gas Pipeline
4700 Highway 56
Owensboro, KY 42301
Voice: 270-852-4943
Fax: 270-852-5010
tim.l.thompson@sscgp.com

7. Southern Star has not yet determined its position on the Application of AGE and hereby reserves the right to do so at a later appropriate date as information becomes available.

WHEREFORE, SOUTHERN STAR RESPECTFULLY REQUESTS THE Commission grant Staff's Motion to Consolidate and this Application for Intervention in this Docket.

Respectfully submitted,

Paul S DeFord

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Jefferson City, MO 65101
Telephone: (573) 893-4336
Facsimile: (573) 893-5398

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Response to Motion to Consolidate And Application to Intervene has been transmitted by e-mail or mailed, First Class, postage prepaid, this 21st day of February, 2007, to:

<u>Name of Company</u> <u>Name of Party</u>	<u>Mailing Address</u> <u>Street Address</u> <u>City State Zip</u>	<u>Email</u> <u>Phone</u> <u>Fax</u>
Alliance Gas Energy Corporation Fischer M James	101 Madison, Suite 400 Jefferson City MO 65101	jfischerpc@aol.com 573-636-6758-Ext: 573-636-0383
Missouri Gas Energy Cooper L Dean	P.O. Box 456 312 East Capitol Jefferson City MO 65102	dcooper@brydonlaw.com 573-635-7166-Ext: 573-635-0427
Missouri Gas Energy Duffy W Gary	P.O. Box 456 312 East Capitol Avenue Jefferson City MO 65102	gwduffy@comcast.net 573-635-7166-Ext: 573-635-3847
Missouri Public Service Commission General Counsel Office	P.O. Box 360 200 Madison Street, Suite 800 Jefferson City MO 65102	GenCounsel@psc.mo.gov 573-751-2690 573-751-9285
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Office Of Public Counsel Mills Lewis	P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City MO 65102	opcservice@ded.mo.gov 573-751-1304 573-751-5562
Ozark Energy Partners, LLC Young Mary Ann	P.O. Box 104595 2031 Tower Drive Jefferson City MO 65110-4595	myoung0654@aol.com 573-634-8109-Ext: 573-634-8224
Ozark Energy Partners, LLC Steinmeier D William	P.O. Box 104595 2031 Tower Drive Jefferson City MO 65110-4595	wds@wdspc.com 573-659-8672-Ext: 573-636-2305

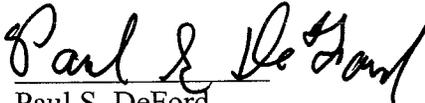
/s/ Paul S. DeFord

VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Paul S. DeFord, of lawful age, being first duly sworn upon his oath states:

That he is an attorney for Southern Star Central Gas Pipeline, Inc.; that he has read the above and foregoing document; and upon information and belief, states that the matters therein appearing are true and correct.


Paul S. DeFord

SUBSCRIBED AND SWORN to before me this 21st day of February, 2007.


Notary Public DEANNA L. VICK

My Commission expires:
DEANNA L. VICK
~~Notary Public - Notary Seal~~
STATE OF MISSOURI - Platte County
My Commission Expires April 14, 2007