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August 24, 1998

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

FILED
AUG 24 1998
Missouri Public
Service Commission

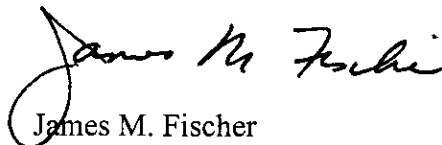
RE: Case No. OO-99-44

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) copies of the Application to Intervene of Southern Missouri Gas Company, L.P. for filing in the above-referenced matter. A copy of the foregoing Application to Intervene has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr
Enclosures

cc: All Parties of Record

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Case No. 00-99-44

COMES NOW Southern Missouri Gas Company, L.P. ("SMGC") and pursuant to 4 CSR 240-2.075 respectfully requests that the Commission grant SMGC the right to intervene in this proceeding. In support of this Application, SMGC states as follows:

1. On July 28, 1998, West Elm Place Corporation, The Empire District Electric Company, St. Joseph Light & Power Company, Arkansas Western Gas Company d/b/a Associated Natural Gas Company, Laclede Gas Company, Missouri-American Water Company and UtiliCorp United Inc. d/b/a Missouri Public Service (hereinafter "The Companies") filed an Application for Rehearing and Stay pursuant to Section 386.500, RSMo 1994¹, and 4 CSR 240-2.160, seeking rehearing regarding the Commission's June 29 Supplemental Order No. 52² ("Order 52") in Case No. 11,110. The Commission established Case No. OO-99-44 to address the Application for

² Order 52 is the order in which the Commission has set out its assessments of expenses directly attributable to all groups of public utilities and also the amounts of expenses not directly attributable to any such group. The purpose of Order 52 was to make the public utility assessments provided for, pursuant to Section 386.370, for the Commission's fiscal year commencing July 1, 1998 (the 1999 fiscal year or FY99).

Rehearing and Stay. The Companies have requested the Commission to reconsider its decision in this order.

2. In its Order Regarding Application for Rehearing and Stay issued on August 5, 1998, the Commission established an intervention deadline of August 31, 1998.

IDENTITY OF APPLICANT

3. Southern Missouri Gas Company, L.P. is a public utility engaged in the distribution, transportation and sale of natural gas in southern Missouri. SMGC is organized as a limited partnership under the laws of Missouri with its principal place of business located at 8801 South Yale, Suite 385, Tulsa, Oklahoma 74137. SMGC is a "gas corporation" and "public utility" pursuant to Sections 386.020(18) and (42) (RSMo. Cum. Supp. 1997), and has been granted a Certificate of Convenience and Necessity to provide natural gas service within the state of Missouri.

4. All correspondence, pleadings, orders and documents in this proceeding should be addressed to:

Tom M. Taylor, President
Southern Missouri Gas Company, L.P.
8801 South Yale, Suite 385
Tulsa, Oklahoma 74137
Telephone: (918) 493-5995

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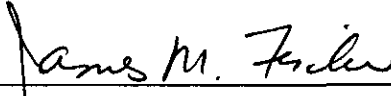
APPLICANT'S INTEREST IN PROCEEDING

5. Southern Missouri Gas Company, L.P. was assessed a regulatory assessment, pursuant to Order 52. As a result, decisions in this proceeding potentially may affect the amount of SMGC's regulatory assessment in 1999, and may potentially affect its regulatory assessment in future years. As a result, SMGC's interest in this proceeding is different from that of the general public. Therefore, SMGC requests the opportunity to intervene and participate in this proceeding in order to monitor the case, and to protect its interests.

6. SMGC generally supports the position of The Companies that have sought a rehearing and stay of Order 52 as it relates to the Article X transfer used to fund the Hancock Amendment refunds. SMGC's participation will aid the Commission in resolving the issues raised in this proceeding.

WHEREFORE, Southern Missouri Gas Company, L.P. respectfully requests the Commission to issue its Order Granting Intervention in this proceeding.

Respectfully submitted,



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Attorney for Southern Missouri Gas Company, L.P.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, postage prepaid, this 24th day of August, 1998, to:

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

Karen Winn, General Counsel
Office of the Commissioner of Administration
Capitol Building, Room 125
Jefferson City, MO 65101

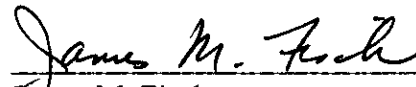
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