

**STEWART & KEEVIL, L.L.C.**  
ATTORNEYS AT LAW

CHARLES BRENT STEWART  
JEFFREY A. KEEVIL

1001 CHERRY STREET  
SUITE 302  
COLUMBIA, MISSOURI 65201-7931

WILLIAM M. SHANSEY  
OF COUNSEL

AREA CODE 573  
TELEPHONE 499-0635  
FACSIMILE 499-0638

**FILED**

NOV 5 1997

MISSOURI  
PUBLIC SERVICE COMMISSION

November 5, 1997

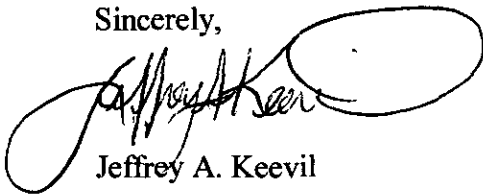
Mr. Cecil I. Wright  
Executive Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

RE: Case No. GR-98-167 -- In the Matter of Missouri Gas Energy's Purchased Gas Cost Adjustment tariff revisions to be reviewed in its 1997-1998 Actual Cost Adjustment.

Dear Mr. Wright:

Enclosed for filing in the above-referenced case are an original and fourteen (14) copies of an Application For Intervention on behalf of Riverside Pipeline Company, L.P. and Mid-Kansas Partnership. Please see that this is brought to the attention of the appropriate personnel. Copies of this filing have on this date been mailed or hand-delivered to Robert J. Hack, counsel for Missouri Gas Energy; the Office of the Public Counsel; and the General Counsel's Office of the Public Service Commission. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er

Enclosures

cc: Robert J. Hack  
Office of the Public Counsel  
General Counsel's Office

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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MISSOURI  
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In the Matter of Missouri Gas Energy's )  
Purchased Gas Cost Adjustment tariff ) Case No. GR-98-167  
revisions to be reviewed in its 1997-1998 )  
Actual Cost Adjustment. )

**APPLICATION FOR INTERVENTION**

COMES NOW Riverside Pipeline Company, L.P. ("Riverside") and Mid-Kansas Partnership ("Mid-Kansas") and in accordance with 4 CSR 240-2.075, apply to intervene and become parties in the above-referenced docket and, in support of this Application For Intervention, respectfully state as follows:

1. Riverside is a present and historic 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").

2. Mid-Kansas is an affiliate of Riverside and a present and historic supplier of natural gas in the State of Missouri (Kansas City, Missouri metro area) to MGE.

3. Riverside/Mid-Kansas have a direct interest in this proceeding as suppliers of natural gas transportation service and natural gas to MGE, since some of the costs associated therewith may be subject to review in this docket. As such, Riverside/Mid-Kansas have 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 Riverside/Mid-Kansas. Further, the granting of the intervention of Riverside/Mid-Kansas will in no way hinder or delay the timely completion of this case, as the docket has only

recently been opened and will not be the subject of Staff review until the conclusion of the 1997-1998 period. While Mid-Kansas/Riverside do not currently have sufficient information to take a position herein, Mid-Kansas/Riverside are concerned that decisions or orders of the Commission herein could adversely impact them.

4. Because Mid-Kansas/Riverside may be directly affected by the Commission's decisions and orders in this case, Mid-Kansas/Riverside have 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 and suppliers to be brought before the Commission. Accordingly, Mid-Kansas/Riverside submit that they meet the criteria for intervention set forth in 4 CSR 240-2.075 and that this Application For Intervention should be granted. The Commission has previously recognized the standing of Mid-Kansas/Riverside to intervene in MGE proceedings by granting intervention to Mid-Kansas/Riverside in MGE's last general rate increase case, Case No. GR-96-285, as well as numerous ACA proceedings involving MGE and/or its predecessor (GR-93-140, GR-94-101, GR-94-228, GR-95-82, GR-96-78 and GR-96-450).

5. Service of all pleadings, correspondence, communications and orders and decisions of the Commission should be made to counsel as follows:

Jeffrey A. Keevil  
Stewart & Keevil, L.L.C.  
Cherry Street Centre  
1001 Cherry Street, Suite 302  
Columbia, Missouri 65201

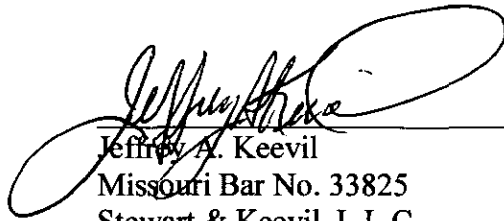
Tino Monaldo  
335 North Washington, Suite 130  
Corporate Square  
P.O. Box 728  
Hutchinson, Kansas 67504-0728

with a copy to the following:

Howard E. Lubow  
Executive Vice-President  
8325 Lenexa Dr., Suite 400  
Lenexa, Kansas 66214

WHEREFORE, having stated their grounds for intervention, Mid-Kansas/Riverside request the Commission issue its Order granting them leave to intervene as full parties 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.  
1001 Cherry Street, Suite 302  
Columbia, Missouri 65201  
(573) 499-0635  
(573) 499-0638 (fax)

ATTORNEY FOR RIVERSIDE  
PIPELINE COMPANY, L.P. and  
MID-KANSAS PARTNERSHIP

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was delivered by first-class mail, or hand-delivery, to Robert J. Hack, counsel for Missouri Gas Energy; the Office of the Public Counsel; and the General Counsel's Office of the Missouri Public Service Commission on this 5<sup>th</sup> day of November, 1997.

