

**BEFORE THE PUBLIC SERVICE COMMISSION
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, Install, Own, Operate,)	Case No. GA-2007-0168
Control, Manage and Maintain a Natural Gas)	
Distribution System to Provide Gas Service in)	
Branson, Branson West, Reed's Spring)	
and Hollister, Missouri.)	

**RESPONSE IN OPPOSITION TO
APPLICATION TO INTERVENE**

COMES NOW Alliance Gas Energy Corporation ("AGE"), pursuant to Commission Rule 4 CSR 240-2.080(15), and for its Response in Opposition to the Application to Intervene filed out of time by the Missouri Propane Gas Association ("MPGA"), respectfully states as follows:

1. AGE initiated the instant proceeding with the filing of its Application on October 26, 2006. In response thereto, the Commission issued its Order Directing Notice and Setting Date for Submission of Intervention Requests ("Order") on November 2, 2006, issuing notice of AGE's application to members of the public at large and other potentially interested parties and establishing an intervention deadline of December 4, 2006.

2. On November 8 and November 30, 2006, respectively, Missouri Gas Energy and Ozark Energy Partners, LLC filed timely applications to intervene, and the Commission granted those applications by order dated December 11, 2006. Thereafter, on February 21, 2007, Southern Star Central Gas Pipeline, Inc. ("Southern Star")

submitted its "Response to Motion to Consolidate and Application to Intervene" in this case, stating that it had been identified as a potential supplier of wholesale gas transportation service to AGE should AGE's application be granted, and that while it had previously intervened as a party to Case No. GA-2006-0561 (noting that it was the only party in Case No. GA-2006-0561 that was not currently a party to this case and, at that time, Staff had filed a motion to consolidate the two cases), its failure to intervene in this proceeding was an oversight. As Southern Star had pled good cause in accordance with the Commission's rule, AGE did not oppose Southern Star's intervention and its application was granted pursuant to the Commission's Order Granting Application to Intervene issued March 6, 2007.

3. Four months after the Commission's deadline for submitting intervention applications, the MPGA filed its Application to Intervene in this matter on April 3, 2007. No allegations of good cause are set forth as required by Commission Rule 4 CSR 240-2.075(5)¹, and AGE opposes this late-filed intervention request.

¹ MPGA merely notes that its failure to timely intervene was "unintentional." (Application, page 3). Curiously, MPGA appears familiar with the application pending in Case No. GA-2006-0561, but it has not submitted a late-filed application to intervene in that proceeding. (Application, page 2).

WHEREFORE, Alliance Gas Energy Corporation respectfully requests that the Commission deny the late-filed Application to Intervene of the Missouri Propane Gas Association.

Respectfully submitted,

/s/ James M. Fischer

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing pleading has been transmitted by e-mail or mailed, First Class, postage prepaid, this 6th day of April, 2007 to counsel of record.

/s/ James M. Fischer

James M. Fischer