

**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, install, own, operate, control, manage) Case No. GA-2007-0168
and maintain a natural gas distribution system)
to provide gas service in Branson, Branson West,)
Reed's Spring and Hollister, Missouri.)

APPLICATION TO INTERVENE

COMES NOW Missouri Gas Energy (MGE), a division of Southern Union Company, by and through counsel, and for its application to intervene pursuant to 4 CSR 240-2.075, respectfully states as follows:

1. MGE is a division of Southern Union Company, which is duly incorporated under the laws of the State of Delaware and conducts business in Missouri under the fictitious name of Missouri Gas Energy. MGE's principal office and place of business is located at 3420 Broadway, Kansas City, Missouri 64111. A copy of a certificate from the Missouri Secretary of State that Southern Union Company is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GM-2003-0238 and is incorporated herein by reference. A copy of a certificate from the Missouri Secretary of State that Missouri Gas Energy is a registered fictitious name of Southern Union Company was submitted in Case No. GM-2003-0238 and is incorporated herein by reference. Other than cases that have been docketed at the Commission, MGE has no pending action or final unsatisfied judgments against it from any state or federal agency or court within the past three (3) years that involve customer service. MGE has a pending general rate case identified as Case No. GR-2006-0422. MGE has no annual report or assessment fees that are overdue. MGE currently conducts business as a "gas

corporation” and provides natural gas service to approximately 500,000 customers in the Missouri counties of Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Pettis, Platte, Ray, Saline, Stone, and Vernon, subject to the jurisdiction of the Missouri Public Service Commission as provided by law.

2. All correspondence, communications, orders and decisions in this matter should be addressed to the undersigned counsel and the following:

Michael R. Noack
Director, Pricing and Regulatory Affairs
Missouri Gas Energy
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3. The Commission established the above-referenced docket to consider the application of Alliance Gas Energy Corporation (Alliance) regarding the proposed construction of natural gas pipelines and the provision of natural gas service in portions of Stone and Taney Counties in Missouri. The Commission has addressed similar applications, in June 1997 in Case No. GA-96-264, and in August of 1998 and 2000, in Case No. GA-98-227, and has a pending application for service in this same general area in Case No. GA-2006-0561.

4. MGE was granted intervention and participated as a party in Cases Nos. GA-96-264, GA-98-227 and GA-2006-0561.

5. MGE states that its interest in this proceeding is to protect the existing rights it has to provide service in areas that have already been certificated to it by the Commission. MGE opposes any attempt by the applicant to provide service in any areas where MGE is already authorized to provide service. MGE also utilizes the Southern Star Central Gas Pipeline (SSC)

as a transporter of natural gas for the gas service which MGE provides in that general area of the State of Missouri, and in particular for the area around Joplin, Missouri, where MGE serves approximately 71,000 customers. MGE also provides services to various areas in Christian and Stone counties. MGE also wishes to assure itself through intervention in this proceeding that the additional demands placed upon the SSC system by the system proposed by the applicant, if it will interconnect with SSC, will not have an adverse effect upon the quality of service provided by MGE to its customers. MGE also wishes to assure itself that the Applicant will take proper measures to protect the existing underground facilities of MGE at such places where Applicant's facilities may parallel or cross MGE's facilities. As such, MGE's interest in this proceeding is different from that of the general public.

6. For purposes of 4 CSR 240-2.075(2), MGE states that it has not yet formed an opinion as to whether it supports or opposes the relief sought by the Applicant.

WHEREFORE, MGE respectfully requests that the Commission issue an order authorizing it to intervene in and participate fully in the above-captioned proceeding.

Respectfully submitted,

D. I. Coe

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ATTORNEYS FOR MISSOURI GAS ENERGY,
A DIVISION OF SOUTHERN UNION COMPANY

Certificate of Service

I hereby certify that two, true and correct copies of the above and foregoing document was sent by electronic mail on this 8th day of November, 2006, to:

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