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January 29, 1999

Mr. Dale Hardy Roberts
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

JAN 29 1999
DEAN L. COOPER

RE: **Union Electric Company and Laclede Gas Company**
Case Nos. ~~GA-99-107~~ and ~~GA-99-236~~
GA-99-107

Dear Mr. Roberts:

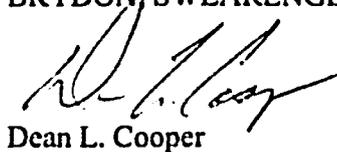
Enclosed for filing in the above-referenced proceeding please find an original and fourteen copies of Missouri Pipeline Company's Application for Participation Without Intervention. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your cooperation.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Dean L. Cooper

DLC/rhg

Enclosures

cc: Office of Public Counsel
Mr. Tom Byrne, Laclede
Mr. Ron Evans, AmerenUE
Mr. Bob Amdor

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

(Seal)

JAN 29 1999

Missouri Public
Service Commission

In the matter of the application of Union)
Electric Company d/b/a AmerenUE for a)
Certificate of Convenience and Necessity)
Authorizing It to Construct, Install, Own,)
Operate, Control, Manage, and Maintain)
Natural Gas Pipeline Facilities and a)
Gas Distribution System for the Public)
in a Portion of St. Charles County,)
Missouri, as an Expansion of Its Presently)
Certificated Area.)

Case No. GA-99-107

In the matter of the application of Laclede)
Gas Company for a Certificate of)
Convenience and Necessity Authorizing It)
to Construct, Install, Own, Operate,)
Control, Manage, and Maintain a Gas)
Distribution System for the Public in a)
Portion of the City of Wentzville, Missouri,)
as an Expansion of Its Presently)
Certificated Area.)

Case No. GA-99-236

**MISSOURI PIPELINE COMPANY'S APPLICATION
FOR PARTICIPATION WITHOUT INTERVENTION**

Comes now Missouri Pipeline Company ("MPC"), and, in accordance with Missouri Public Service Commission ("Commission") Rule 4 CSR 240-2.075(5), states as follows as its application to participate without intervention in the above-referenced matter:

1. MPC is a Delaware corporation, in good standing in all respects, with its principal office and place of business at 10700 East 350 Highway, Kansas City, Missouri 64138. MPC is engaged in the business, generally, of designing, constructing, owning and operating natural gas transmission pipeline systems and conducts such operations in Missouri subject to the jurisdiction of the Commission. MPC is a subsidiary of UtiliCorp Pipeline Systems, Inc. which, in turn, is a

subsidiary of UtiliCorp United Inc. ("UtiliCorp"), an electric and natural gas corporation with operations subject to the jurisdiction of the Commission. A copy of MPC's Certificate of Corporate Good Standing-Foreign Corporation as issued by the Secretary of State of the State of Missouri was recently provided to the Commission in Case No. GO-97-285 and is hereby incorporated by reference in accordance with Commission Rule 4 CSR 240-2.060(2)(E).

2. All pleadings, notices, orders and other communications and correspondence in regard to this application and proceeding should be directed to:

Robert J. Amdor
UtiliCorp United Inc.
1815 Capitol Avenue
Omaha, Nebraska 68102
(402) 221-2227

Dean L. Cooper
Brydon, Swearingen & England P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, Missouri 65102
(573) 635-7166

3. By this application, MPC seeks permission to participate without intervention in accordance with Commission Rule 4 CSR 240-2.075(5). MPC asks that its participation include receipt of all pleadings and other filings made by the parties; receipt of all orders issued by the Commission; receipt of all testimony filed by the parties; the opportunity to make an opening statement; and, the opportunity to file briefs in this matter.

4. MPC's interest in the proceeding stems from the fact that it provides intrastate transportation of natural gas to both Union Electric Company d/b/a AmerenUE and Laclede Gas Company near Wentzville in St. Charles County, Missouri. The result of the case may create the need for additional delivery points and /or other pipeline construction. Thus, this case may have an

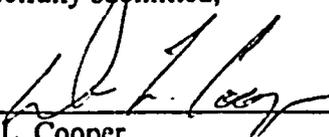
affect on the development of MPC's natural gas pipeline and MPC has an active interest in outcome of the proceeding.

5. MPC is unable to make a statement of the positions it will take until it has had the opportunity to review the evidence that has been, and will be, filed in this docket.

WHEREFORE, MPC respectfully requests that the Commission issue its order:

- (a) Granting MPC permission to participate without intervention in this proceeding in accordance with Commission Rule 4 CSR 240-2.075(5); and,
- (b) Granting such further relief as the Commission deems appropriate.

Respectfully submitted,



Dean L. Cooper #36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65101-0456

Attorneys for Missouri Pipeline Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 29th day of January, 1999, to all parties of record.

