

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

**ORIGINAL**

CHARLES BRENT STEWART  
JEFFREY A. KEEVIL

1001 CHERRY STREET  
SUITE 302  
COLUMBIA, MISSOURI 65201-7931

TELEPHONE (573) 499-0635  
FACSIMILE (573) 499-0638

February 20, 2001

Missouri Public Service Commission  
Attn: Secretary of the Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Mo. 65102-0360

RE: Case No. GW-2001-398

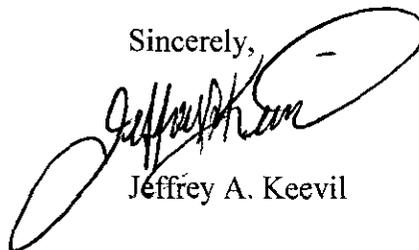
**FILED<sup>3</sup>**  
FEB 20 2001  
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of an Application to Serve on Task Force on behalf of Kansas Pipeline Company.

Copies of this filing have on this date been mailed or hand-delivered to the Office of the Public Counsel and the Commission's General Counsel's Office. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er

Enclosures

cc: Office of the Public Counsel  
General Counsel's Office

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
FEB 20 2001  
Missouri Public  
Service Commission

In the Matter of a Commission Inquiry        )  
Into Purchased Gas Cost Recovery            )        Case No. GW-2001-398

APPLICATION TO SERVE ON TASK FORCE

COMES NOW Kansas Pipeline Company ("KPC"), pursuant to the Commission's Order Establishing Case and Creating Task Force issued on January 23, 2001 ("January 23 Order"), and for this Application to Serve on Task Force respectfully states as follows:

1. KPC, a Kansas General Partnership, is a FERC-jurisdictional 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"). KPC began supplying such service to MGE on or about June 1, 1998.
2. While the January 23 Order does not specifically mention transportation cost, the Commission currently examines both transportation and commodity costs in the context of the PGA/ACA process, and given the broad directive given the task force in the January 23 Order, proposals may be made which affect transportation cost recovery. Therefore, KPC has a direct and distinct interest in this proceeding as a supplier of natural gas transportation service to MGE. No other party to this proceeding can adequately represent the interests of KPC.

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3. Furthermore, granting the proposed intervention will serve the public interest by allowing the input of one of MGE's material transporters to be brought before the Commission. Furthermore, the Commission has previously recognized that KPC and its predecessors have sufficient standing to support intervention in MGE proceedings by granting intervention to KPC and/or its predecessors in two MGE general rate increase cases, Case No. GR-96-285 and GR-98-140, 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, GR-96-450, GR-98-167, GR-99-304, and GR-2000-425<sup>1</sup>).

4. Therefore, pursuant to the January 23 Order, KPC nominates the following individual, or his designee in the event that he is unable to attend a meeting, to serve on the task force:

Chris Kaitson  
General Counsel  
Kansas Pipeline Company  
1100 Louisiana, Ste. 2900  
Houston, Texas 77002  
(713) 650-8900  
(713) 653-6710 (fax)

In addition, KPC also requests that service of all pleadings, correspondence, communications and orders and decisions of the Commission in this proceeding be sent to the following as well as to the above:

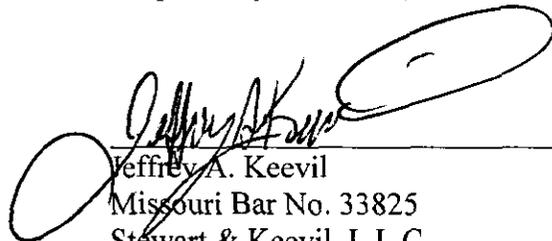
Jeffrey A. Keevil  
Missouri Bar No. 33825  
Stewart & Keevil, L.L.C.  
1001 Cherry Street, Suite 302  
Columbia, Missouri 65201  
(573) 499-0635  
(573) 499-0638 (fax)  
[per594@aol.com](mailto:per594@aol.com)

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<sup>1</sup> KPC has also applied for intervention in MGE's ACA Case No. GR-2001-382.

WHEREFORE, having stated its interest for participation in this proceeding, KPC requests the Commission issue its Order establishing Mr. Kaitson (or his designee) as a member of the task force created in this proceeding, and for such other and further relief as the Commission may deem appropriate.

Respectfully submitted,

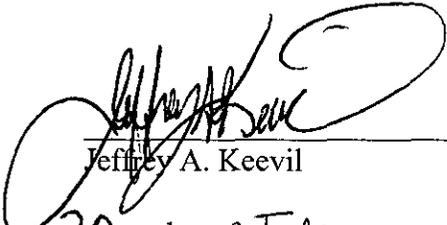
A handwritten signature in black ink, appearing to read "Jeffrey A. Keevil", is written over a horizontal line. The signature is stylized and includes a large loop on the left side and a large oval on the right side.

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)  
[per594@aol.com](mailto:per594@aol.com)  
ATTORNEY FOR KANSAS  
PIPELINE COMPANY

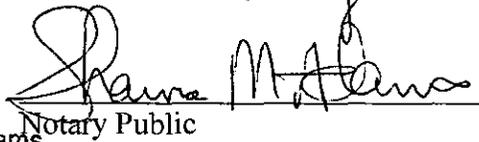
VERIFICATION

STATE OF MISSOURI     )  
  )  
COUNTY OF BOONE     )     ss

I, Jeffrey A. Keevil, being first duly sworn verify that I: am an attorney for Kansas Pipeline Company ("KPC"), licensed to practice law in the State of Missouri; have been authorized to file the foregoing on behalf of KPC; and that the foregoing is correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Jeffrey A. Keevil

Subscribed and sworn to before me this 20 day of February, 2001.

  
\_\_\_\_\_  
Notary Public

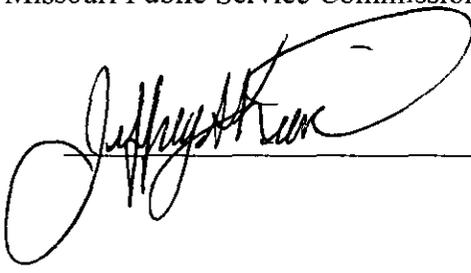
Shawna M. Adams  
Notary Public - Notary Seal  
STATE OF MISSOURI  
Boone County

My Commission expires: My Commission Expires: Jan. 13, 2004



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to the Office of the Public Counsel; and the General Counsel's Office of the Missouri Public Service Commission on this 20<sup>th</sup> day of February, 2001.

  
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