

Data Requests by Requestor

Rate Case ID: GR-2004-0209

| DR# | Requested | Unique ID# | Assigned To |
|-----------|---|------------|-----------------|
| 0610 | Busch | 4242 | dkirkland@mgem |
| Question: | Please provide transaction dates, amount of revenues, duration of release, and names of entities involved in each capacity release included in OPC DR No. 608. | | |
| Response: | Please refer to OPC DR 0608 in this case. | | |
| 0611 | Busch | 4243 | mnoack@mgemai |
| Question: | In MGE's updated filing, what level of off-system sales/capacity release revenues has MGE included in its revenue requirement. | | |
| Response: | There are no off-system sales/capacity release revenues included in the updated test year. | | |
| 0612 | Busch | 4443 | dnoian@mgemai. |
| Question: | Please provide the section of MGE's budget for 2001, 2002, 2003, 2004, 2005, and 2006 that relates to capacity release revenues and off-system sales. | | |
| Response: | FY 2001 - 0 FY 2002 - 0 FY 2003 - \$1,200,000 FY 2004 - \$1,600,000 FY 2005 & FY 2006 budgets have not yet been prepared. | | |
| 0613 | Busch | 4444 | dkirkland@mgem |
| Question: | In response to OPC DR No. 607, please verify that the only months in which MGE made off-system sales were October 2001 (\$107,300), December 2001 (\$185,356), and March 2003. | | |
| Response: | The months originally reported on DR 0607 were the only months in which MGE made off-system sales. | | |
| 0614 | Busch | 4445 | mnoack@mgemai |
| Question: | According to MGE's response to OPC DR No. 608, MGE began releasing capacity to schools in February 2003. According to MGE tariff P.S.C. MO. No. 1, second revised, Sheet No. 54, effective October 28, 2002; the Experimental School Transportation Program began on July 11, 2003. Please explain all capacity releases between February 2003 and June 2003 that were credited as school release. | | |
| Response: | The program became effective by tariff on October 28, 2002 but was only available to public elementary or secondary schools. On July 11, 2003 the program by law expanded to include private, parochial and charter schools also. The capacity releases credited between February 2003 and June 2003 were for the public schools only. | | |
| 0701 | Busch | 4102 | mnoack@mgemai |
| Question: | Please provide a copy of MGE's FERC Form 2 for the most recent year. | | |
| Response: | Please refer to the attached copy which has been filed with the MPSC. | | |
| 0702 | Busch | 4103 | mnoack@mgemai |
| Question: | Has MGE prepared a class cost of service study in this case? If yes, please provide a complete set of workpapers (including electronic files if applicable) that support MGE's class cost of service study. If not, please explain why MGE believes that a class cost of service study is not needed. | | |
| Response: | Work papers have been provided previously to the OPC both in hard copy and electronically. | | |
| 0703 | Busch | 4104 | jcummings@rjcov |
| Question: | Does the Company believe that any revenue shifts among rate schedules are warranted at this time? If not, please explain why the Company believes that no revenue shifts are warranted. | | |
| Response: | Yes, the Company proposed modest changes in customer class revenue responsibilities in its November 2003 filing. The proposed class revenue changes are shown page 26, line 22 of the Direct Testimony of Company witness F. Jay Cummings. The resulting class revenue responsibilities with these changes compared to the revenue responsibilities at present adjusted revenue (computed from the information contained in Schedule FK+JC-3, page 1) are as follows: | | |

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Missouri Public
Service Commission

Exhibit No. 602
Case No(s) GR-2004-0209
Date 6-25-04 Rptr TS

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| DR# | Requested | Unique ID# | Assigned To |
|------|-----------|---|-----------------|
| | | Residential Small General Service Large General Service Large Volume Service | |
| 0704 | Busch | 4105 | jcummings@rjcov |
| | Question: | Please answer each of the following questions. 1) Does the Company believe that rates should be set at cost of service? 2) In what cases should rates not be set at cost of service? 3) How important does the cost of service is in the Company's rate design? 4) What other factors does the Company believe to be relevant in designing the Company's rates? 5) Does the Company believe that the Company's proposed rate increase allocation reflects cost of service? Please explain. Please provide a copy of any documents that are referred to in the response of this data request. | |
| | Response: | Please see the Direct Testimony of Company witness F. Jay Cummings, page 22, lines 5-13 and page 26, lines 8-23. | |
| 0705 | Busch | 4106 | mnoack@mgemai |
| | Question: | Please provide a complete set of workpapers (including electronic files if applicable) that support MGE's proposed rate design and proposed allocation of any overall revenue requirement increase to customer classes. | |
| | Response: | Work papers have been provided previously to the OPC both in hard copy and electronically. | |
| 0706 | Busch | 4107 | mnoack@mgemai |
| | Question: | Please provide all information that would be needed to perform a class cost of service study. Such information should include the amount in each FERC account, class bill, usage, and revenue information corresponding to all customer classes of the Company. Please also break down the class bill, usage and revenue information for the General Service class into the residential class and the commercial and industrial | |
| | Response: | Please see response to DR 0705 | |
| 0707 | Busch | 4108 | jcummings@rjcov |
| | Question: | Please provide monthly actual and normalized sales volumes for each customer class for the test year. | |
| | Response: | Please see revenue work papers I-1 through I-8 previously provided to the Office of the Public Counsel. | |
| 0708 | Busch | 4109 | jcummings@rjcov |
| | Question: | Have the billing determinants shown in your responses to OPC DR Nos. 702, and/or 704 been weather normalized? If yes, please provide detailed workpapers supporting the weather normalization calculations. | |
| | Response: | Yes. The details supporting the weather normalization adjustment are provided in revenue work papers M-1 through M-194 previously provided to the Office of the Public Counsel. | |
| 0709 | Busch | 4110 | mnoack@mgemai |
| | Question: | If not provided in response to DR No. 702, please provide a breakdown of test year payroll expense by FERC primary account number. This breakdown should show the payroll expense contained in each of the Operation and Maintenance expense accounts. | |
| | Response: | Work papers have been provided previously to the OPC both in hard copy and electronically. | |
| 0710 | Busch | 4111 | mnoack@mgemai |
| | Question: | If not provided in response to OPC DR No. 702, please provide a breakdown of Taxes Other Than Income Tax for the test year, as updated and adjusted for the rate case. | |
| | Response: | Work papers have been provided previously to the OPC both in hard copy and electronically. | |
| 0711 | Busch | 4112 | jcummings@rjcov |

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| DR# | Requested | Unique ID# | Assigned To |
|------|-----------|---|-----------------|
| | Question: | Please provide a breakdown by customer rate schedule (including the breakdown of General Service rate class to Residential and Commercial & Industrial rate groups) of Forfeited Discount Revenues (Account 487) for the test year. | |
| | Response: | Please see the electronic revenue work papers previously provided to the Office of the Public Counsel. In the folder labeled "311 Reports," there is a file for each month of the test year, e.g. "JULY02." In each monthly file, consult the spreadsheet in the working tab, e.g. "JUL02 Working." In this tab, there is a section labeled "Delayed Payment" with the dollar amounts shown in Column D. Column C can be used to derive subtotals for residential (21), commercial (22 and 23), industrial (25), and transportation (38). | |
| 0712 | Busch | 4113 | dkirkland@mgem |
| | Question: | What is the Company's strategy for utilizing peaking facilities (e.g., storage behind the city gate and/or propane injection) to minimize gas costs and avoid interrupting service to customers? Please identify the order of actions (e.g. utilizing storage facility, propane injection, curtailment of interruptible customers, etc.) that the Company will take at peak periods. | |
| | Response: | The Company has no peaking facilities as described in the question "e.g. storage behind the city gate and/or propane injection." The Company will fully utilize storage assets under contract and located above the city gate to serve peak day demand prior to initiating customer curtailment. | |
| 0713 | Busch | 4114 | jcummings@rjcov |
| | Question: | Has the Company done a replacement study for the cost of meter, regulator and services? If yes, please provide the study. If not, please provide a copy of all documents (both hard copy and electronic files if available) created by the Company in the last five years that contain data or any analysis of data relating to the length, size, and other characteristics of MGE's distribution mains, services, meters, or regulators. If a sampling of data is involved, please provide a description of the sampling procedure and a detailed explanation about how the data is utilized in the Company's cost of service study. | |
| | Response: | The average unit costs of meters, regulators, and services for installations in fiscal years 2002 and 2003 by customer class are shown in revenue work paper Y-1 previously provided to the Office of the Public Counsel. | |
| 0714 | Busch | 4115 | jcummings@rjcov |
| | Question: | Please provide a list of meters and regulators currently in use by type and rate class together with the corresponding material costs. Please also provide typical installation costs for each type of meters and regulators that are currently in use. | |
| | Response: | 1) Please refer to the attached list of meters and regulators which is split between residential and non-residential along with the current unit cost. 2) See the Company's Response to OPC Data Request No. 713 Note: The available breakdown by customer type does not correspond to the company's customer classes reflected in its tariffs. | |
| 0715 | Busch | 4116 | jcummings@rjcov |
| | Question: | Regarding the cost of services, meters and regulators, please explain if there is any portion of the cost that is paid directly by the customers at the time when the customer is hooked up to the system, or not recorded to account 380-384 due to any other reason. Please provide a copy of relevant portion of the tariff. | |
| | Response: | Please refer to the attached sheets R-32, R-33, R-33.1 and R-33.2. | |
| 0716 | Busch | 4117 | jcummings@rjcov |
| | Question: | Please provide any information (including number, type and costs) regarding the meters, regulators, and services that are not provided in responses to the previous data requests. Please break down such information for 1) meters, regulators, and services that are in store, 2) meters, regulators, and services that are currently used by customers, and 3) meters, regulators, and services that are used for the purpose of the Company. | |
| | Response: | There is no additional information. | |
| 0717 | Busch | 4118 | sholcomb@mgem |
| | Question: | Please explain the relationship between meters, regulators, and services. For example, is it true that one meter would match one regulator and one service line? Are there occasions that a meter needs multiple regulators or a regulator is used for multiple meters? Are there occasions that one service line is connected to multiple | |

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Response: There is usually a match of one service to one regulator to one meter. meters? Please identify those occasions.

Occasionally there are multiple regulators for one meter. These occasions are due to the requirements for overpressure protection, where MGE installs a worker regulator and a monitor regulator. MGE will also install multiple regulators to "double cut" the delivery pressure to a customer because of pressure in the main greater than 60 psi.

0718 Busch 4119 jcummings@rjcov

Question: If a customer has multiple meters, will he (it) receive multiple bills? Please provide a copy of relevant portion of the tariff. If there are customers who are served on a single account by multiple meters, please provide the number of such customers for each customer class. If the exact number of such customers is not available for a customer class, please identify the approximate percentage of such accounts.

Response: 1) A customer with multiple meters will not receive multiple bills unless the customer is served at multiple premises and then bills will be sent to each location.

2) Attached are Sheets R-40 and R-41, Section 5.03 which deals with multiple metering.

3) Currently there are approximately 50 LV transportation customers which have multiple meters. The LV class is the only class which has any significant percentage of customers with multiple meters. The percentage of customers in all classes with multiple meters is less than .05%.

0719 Busch 4120 dglass@mgemail.

Question: Please identify the percentage of customers who are served on the low-pressure portion of the Company's distribution system for each customer class.

Response: Interpreting "served on" as the main to which the customer's service line is connected and defining low-pressure mains as those that operate at 60 psi or less, then the majority (more that 97%) of MGE customers for all classes are served from low-pressure mains. It should be noted that to receive service, these customers are "served" by mains throughout MGE's integrated distribution system.

0720 Busch 4121 dglass@mgemail.

Question: If there are customers who are served on a single account by multiple regulators, please provide the number of such customers for each customer class. If the exact number of such customers is not available for a customer class, please identify the approximate percentage of such accounts.

Response: Less than 3 % of the residential customers are served using multiple regulators.
Less than 10% of all Commercial customers are served using multiple regulators.
Less than 25% of all Industrial customers are served using multiple regulators.

Note: The available breakdown by customer type does not correspond to the company's customer classes reflected in its tariffs.

0721 Busch 4122 dingolia@mgemail

Question: Please provide the approximate ratio of service count to meter count for each customer class.

Response: The information is not available to accurately match up the number of services with the number of meters by customer class. The approximate ratio is 1 to 1. Please refer to the response to DR 0717 which discusses the relationship of regulator, meter and service.

0722 Busch 4123 dnolan@mgemail.

Question: Please provide in an electronic file the continuous property record of the FERC account 376 through 383. Please also include a definition list of the CPR fields.

Response: Please refer to the attached CD. The various headings are defined as follows:

Ferc - Ferc Account Number
Work area - Physical location of the asset

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|-----------|--|------------|-----------------|
| 0723 | Busch | 4124 | dnoian@mgemail. |
| Question: | Has the Company conducted a study to determine the meter reading cost for each customer class? If yes, please provide the study. If not, please provide any documents and analysis that are relevant to the determination of meter reading cost for each customer class. | | |
| Response: | All classes with the exception of large volume are read using our automated meter reading system. The large volume class customers are read using electronic gas measurement. The meters from the various classes are combined together in meter reading routes, so the cost to read the various classes using the AMR system would not vary. | | |
| | The company has not conducted a study to determine the cost of meter reading by class. | | |
| | Attached is a file that details the annual expenses for meter reading with the AMR system which would cover all customer classes except Large Volume and a file that details the annual expenses for meter reading with EGM system which would cover the Large Volume customer class. | | |
| 0724 | Busch | 4125 | dnoian@mgemail. |
| Question: | Does the Company utilize any automated remote meter reading equipment for any of its customers? If yes, please explain who is and will be using this equipment, how the initial cost and monthly cost are recorded, and how the costs are paid by customers. Please also identify the number of accounts or the percentage of the accounts that are utilizing automated remote meter reading equipment for each customer class. | | |
| Response: | The company uses automated meter reading for all classes of customers except large volume. Large volume customers are read using electronic gas measurement system. | | |
| | The automated meter reading equipment is operated by 6 van drivers and one AMR specialist. | | |
| | The electronic gas measurement system is managed by one system administrator. | | |
| | The initial cost of the automated meter reading system was recorded in account 101 3970. The monthly costs are recorded to account 902. | | |
| | The costs of meter reading are paid by the customer through the customer charge and volumetric energy charge portion of the bill. | | |
| | 100% of the MGE customers are read using automated meter reading or electronic gas measurement. | | |
| 0725 | Busch | 4126 | mnoack@mgemail |
| Question: | Does the Company have any plan or has the Company considered implementing an automated meter reading system to perform the Company's metering functions? Please provide a copy of all documents created by or for MGE in the last three years that contain descriptions or analysis of using an automated meter reading system (AMR) to perform the Company's metering functions. If no such documents exist, please provide a statement to that effect. | | |
| Response: | The Company implemented its AMR program in the fall of 1997 into the spring of 1998. All studies and documentation regarding that program would have been prepared at that time or before. The costs of that program were dealt with in Case No. GR-98-140. | | |
| 0726 | Busch | 4127 | jcummings@rjcov |
| Question: | Please provide any information available in the last 5 years regarding actual experienced average cost-per-foot cost for various types of main installation projects, on a rolling twelve-month basis. Please identify the type of main projects, such as new business extension, relocation, reinforcement, maintenance replacement, etc. Please also explain the approximate proportion of each type of main projects. | | |
| Response: | Please refer to the attached file which lists the actual experienced average cost-per-foot for various types of main installation projects for the last 5 years. MGE does not maintain an average rolling twelve month cost-per-foot. The data is available on the worksheet to derive any averages desired along with totals and | | |

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0727 Busch 4128 jcummings@rjcov

Question: Please provide in electronic format estimates of the monthly peak day demands for all of the customer classes for the test-year period. If the information is not available in the form requested, please provide any monthly peak demand information that is available.

Response: Estimates of average use by customer class for the three days associated with the greatest deliveries during the test year is developed in revenue work paper X-1 previously provided to the Office of the Public Counsel. The methodology in this work paper can be used to derive estimates of class monthly peak demands using the electronic version of this work paper (file labeled "Peak Estimate" in the "Cost of Service Study" folder) previously provided to the Office of the Public Counsel by applying the HDDs associated with the coldest day in the month, the number of days in the month reflected in the sales class estimated usage per day, the number of regular bills as adjusted for each class and region for the month, and the total and LVS deliveries on the selected day in the month. All of this information except total and LVS deliveries for specific days is provided in the revenue work papers previously provided to the Office of the Public Counsel. Total and LVS deliveries by day are available for review in the Company's Kansas City offices. Work paper X-1 shows the January (1/23/03) and February (1/24/03) peak day estimates:

| | Residential | SGS | LGS | LVS | Total |
|--------------------|-------------|-----------|---------|-----------|-----------|
| January 1/23/2003 | 4,563,347 | 1,403,685 | 198,555 | 1,222,180 | 7,387,768 |
| February 2/24/2003 | 4,222,263 | 1,301,176 | 197,304 | 1,297,380 | 7,018,123 |

0728 Busch 4129 jcummings@rjcov

Question: Please provide a listing which shows separately for distribution mains and transmission mains the total footage by diameter and material type.

Response: The footage, by size and type, of the Company's distribution mains is shown on revenue work paper W-1 previously provided to the Office of the Public Counsel. The Company does not have any transmission

0729 Busch 4130 jcummings@rjcov

Question: Please provide a copy of all studies that the Company performed in the last ten years in order to analyze the additional investment required and greater complexity in the service, metering and billing process associated with large customers. Please identify the time when such studies are conducted.

Response: The Company has not performed any such studies. The company has had to implement a new billing process effective 11/1/03 due to the termination of burner-tip-balancing and Southern Star's new daily allocation tariffs.

0730 Busch 4131 cwest@mgemail.

Question: Please provide a list of all instances in the past five years when the Company has interrupted service to customers due to capacity constraints behind the city gate for reasons other than the repair of distribution mains or services. For each such instance, please state: a) the date(s) of the interruption; b) the duration of the interruption; c) the number of customers interrupted in each customer rate class; and d) the reason for the

Response: Missouri Gas Energy has not interrupted service to customers in the past five years due to capacity constraints behind the city gate for reasons other than the repair of distribution mains or services.

0731 Busch 4132 cwest@mgemail.

Question: How does MGE determine when and which customers to interrupt? How does MGE carry out the interruption?

Response: Refer to Missouri Gas Energy's General Terms and Conditions For Gas Service tariff, Sheets R81-82 which are attached.

0732 Busch 4133 dglass@mgemail.

Question: Please describe in detail how the Company designs and plans its Mains system to meet design day peak system requirements. Other than design day peak requirements, what factors might enter into the design of the Mains system?

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|------|-----------|--|-----------------|
| | Response: | MGE designs its distribution systems to supply the anticipated customer load on a peak load day. The pipe size and operating pressure of the existing systems are considered. The only other consideration may be anticipated growth in the area. | |
| 0733 | Busch | 4134 | dglass@mgemail. |
| | Question: | Would the Company have 100% confidence that it would be able to meet the peak demands of all of his customers regardless of the location of its customers and the time of year when their peak demand occurs just by building a system that has the capacity to meet all customer's demand on the system designed peak day? In other words, are there times that the Company needs to enhance part of the system not because of the peak demand requirement but because of some other regional seasonally non-coincident demand requirement | |
| | Response: | MGE designs its systems to meet the anticipated peak load, whether this load coincides with the coldest day or peak consumption of a commercial or industrial customer. | |
| 0734 | Busch | 4135 | dglass@mgemail. |
| | Question: | Is distribution mains of the size 2" or below used in serving large volume, interruptible or transportation customers? If yes, approximately what percentage of the 2" or below distribution mains is used in serving customers in each of these classes? | |
| | Response: | The following information is based on interpreting the word "serving" to mean the main to which the customer's service line is connected. In this context, approximately 251,334 customers are served from 2" mains. Defining large volume customers as those who have meters with capacities greater than 10,000 scfh, 66 (0.0263% of total customers served by 2" mains) commercial customers who are not transportation customers and 3 (0.0012% of all customers served by 2" mains) industrial customers who are not transportation customers are served by 2" mains. Note: The available breakdown by customer type does not correspond to MGE's customer classes reflected in its tariff. | |
| | | Of the transportation customers, 14 (0.0056% of all customers served by 2" mains) commercial and 8 (0.0032% of all customers served by 2" mains) industrial customers are served by 2" mains. | |
| | | The actual percentage of the total footage of 2" mains that is used to "only" serve the large volume, transportation customers cannot be calculated. It should be noted that to receive service, all of these customers are "served" by mains throughout MGE's integrated distribution system. | |
| 0735 | Busch | 4136 | jcummings@rjcov |
| | Question: | Please provide a summary of total length and total original cost for distribution mains by material type, by size and by year. | |
| | Response: | Please refer to the attached spreadsheet which lists mains by size, type, cost and vintage. | |
| 0736 | Busch | 4137 | jcummings@rjcov |
| | Question: | Has the company done an avoided cost study for its interruptible service class in the last ten years? If yes, please provide a copy of the study. | |
| | Response: | The Company does not have any interruptible service classes, and the Company has not performed any such studies for any other customer class(es). | |
| 0737 | Busch | 4138 | jcummings@rjcov |
| | Question: | Do interruptible customers get interruptible credits for the hours that they are interrupted? If yes, what is the basis for the interruptible credit? If not, please explain how the interruptible customers are compensated for the time that their services are curtailed. | |
| | Response: | Not applicable. | |
| 0738 | Busch | 4139 | jcummings@rjcov |
| | Question: | Has the Company done a replacement study for the cost of mains in the last ten years? If yes, please provide a copy of the study. | |
| | Response: | The current cost of mains, by type and size, is developed in revenue work papers W-4 and W-5 previously provided to the Office of the Public Counsel. | |

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| DR# | Requested | Unique ID# | Assigned To |
|------|-----------|---|-----------------|
| 0739 | Busch | 4559 | mnoack@mgemail |
| | Question: | Please provide all supporting documentation for all service charge changes as described on page 19 of Mr. Cummings' direct testimony. | |
| | Response: | The workpapers supporting the service charge calculations were included in Mr. Cumming's workpapers supplied to OPC under tab G. The workpapers supporting the loading rates referenced in Mr. Cummings' workpapers are attached. | |
| 0740 | Busch | 4560 | cwest@mgemail. |
| | Question: | Please provide all account information for each SGS and LGS customer that would be affected by the proposed apartment/rental unit reclassification. | |
| | Response: | This issue was resolved during the settlement conference and no further work was done in answering this data request. | |
| 1001 | Bolin | 3995 | dnolan@mgemail. |
| | Question: | Please provide a copy of the Company's general ledger for the period July 1, 2002 to present. This is a continuing request, please update the information as each new month closes. | |
| | Response: | Attached is a CD with the requested GL. | |
| 1002 | Bolin | 3996 | mnoack@mgemail |
| | Question: | Please provide copies of all work-papers that support (i.e., identify data, identify all sources of data, show calculations and analysis, etc.) the schedules (e.g., rate base, revenues, expenses, purchased gas, taxes, accounting adjustments, etc.) contained within the Company's rate increase filing. Please provide the data in computer readable (preferable Microsoft Excel) and hardcopy form. | |
| | Response: | Please refer to the attached hard copy of the workpapers and the CD with the electronic version of the workpapers and the filing. | |
| 1003 | Bolin | 3997 | dnolan@mgemail. |
| | Question: | Please provide copies of all in-force leases (e.g., automobile, rental, building, etc.) | |
| | Response: | Please refer to the attached copies of all in-force leases. | |
| 1004 | Bolin | 3998 | mnoack@mgemail |
| | Question: | Please provide the following: | |
| | | 1. A list (in Excel and hardcopy form) of all Company employees (i.e., full-time, temporary, part-time, etc.), by name, employee number, employment status and position/title at 6/30/2003. | |
| | | 2. A list (in computer readable and hardcopy form) of Company employees (i.e., full-time, temporary, part-time, etc.) hired and terminated since 6/30/2003 to current, by name, employee number, and title. | |
| | | 3. For each person in #1 and #2 above also provide their current hourly salary and/or annual wage. | |
| | | 4. This is a continuing request, please update the information as it changes. | |
| | Response: | 1)The information requested is included in the workpapers supplied in response to OPC 1002. | |
| | | 2)Please refer to the attached list. | |
| | | 3)Please refer to items 1 and 2. | |
| 1005 | Bolin | 3999 | dnolan@mgemail. |
| | Question: | Please provide the following: | |
| | | 1.A reconciliation of overtime hours, and charges incurred by the Company, by employee classification, for each fiscal year 2001 and 2002, and for the twelve months ended 6/30/2003. | |
| | | 2.A reconciliation of temporary employee hours and charges incurred by the Company each fiscal year 2001 and 2002, and for the twelve months ended 6/30/2003. | |