

1. Omega admits the allegations contained in paragraph 1.
2. United Pipeline Systems, LLC is a limited liability company. The remaining allegations in paragraph 2 call for a legal conclusion and Omega is without sufficient knowledge with which to admit or deny the allegations at this point.
3. Omega admits the allegations contained in paragraph 3.
4. Omega denies the allegations as stated in paragraph 4.
5. Omega admits, subject to check, that the referenced statutory provision appears to have been correctly quoted.
6. Omega admits, subject to check, that the partial reference to the statutory provision appears to have been, accurately quoted.

7. Omega admits that Staff, through the General Counsel, has authority to file certain complaints under certain circumstances and conditions. Omega denies that the referenced rule authorizes Staff to bring the instant Complaint against Respondent.

8. Omega admits that Attachment A to the Complaint is Staff's Report of its preliminary findings, but that said report contains material inaccuracies. Omega admits that Staff has filed a motion for protective order.

COUNT I

9-16. Count I of the Staff's Complaint does not state any claim for relief against Omega and no answer is required. To the extent an answer is required, Omega generally denies the allegations of Count I, except insofar as such allegations are otherwise answered by the Respondents to which that Count is directed.

COUNT II

17. Paragraph 17 of the Complaint does not require an answer.
18. Omega denies the allegation in paragraph 18 of the Complaint.
19. Omega denies the allegation in paragraph 19 of the Complaint.
20. Omega is without sufficient knowledge to admit or deny the allegation in paragraph 20 of the Complaint.

COUNT III

21-28. Count III of the Staff's Complaint does not state any claim for relief against Omega and no answer is required. To the extent an answer is required, Omega generally denies the allegations of Count III, except insofar as such allegations are otherwise answered by the Respondents to which that Count is directed.

COUNT IV

29-34. Count IV of the Staff's Complaint does not state any claim for relief against Omega and no answer is required. To the extent an answer is required, Omega generally denies the allegations of Count IV, except insofar as such allegations are otherwise answered by the Respondents to which that Count is directed.

35. In addition to the responses stated above, Omega offers the following additional objections, defenses and other matters:

a) Staff does not have standing to file a complaint challenging the justness and reasonableness of the rates of MPC and MGC. Section 386.390.1 provides in the pertinent part that **"...no complaint shall be entertained by the commission, except upon its own motion,** as to the reasonableness of any rates or charges of any gas, electrical, water, sewer, or telephone corporation, unless the same be signed by the public counsel or the mayor or the president or chairman of the board of alderman or a majority of the council, commission or other legislative body of any city, town, village or county, within which the alleged violation occurred, or not less than twenty-five consumers or purchasers, or prospective consumers or purchasers, of such gas, electricity, water, sewer or telephone service."

Staff, through the office of General Counsel, is not among the entities identified in the statute that are authorized to complain as to the reasonableness of rates and charges. Omega is not aware of any motion made and approved by the Commission directing such a complaint be filed and certainly not a motion for which Omega received any required notice.

b) As set forth in the Motion to Dismiss, filed by Omega on April 26, 2006, the Staff Complaint makes no allegation that Omega is a "gas corporation" within the statutory definition set forth in Section 386.020(16) and for this reason fails to state a claim for relief upon which the

Commission would have subject matter jurisdiction to regulate or otherwise supervise or interfere with Omega's business.

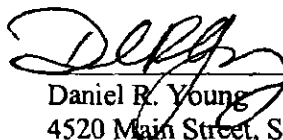
c) As set forth in the Motion to Dismiss, filed by Omega on April 26, 2006, the Staff's prayer in Count II of the Staff's Complaint is barred pursuant to Art. I, Sec. 8, Cl. 17 of the United States Constitution, and R.S.Mo. §§ 12.030 and 12.040 in that Omega's business providing utility service within the federal enclave of Fort Leonard Wood, Missouri is subject to exclusive federal jurisdiction with which the Staff may not interfere.

d) As set forth in the Motion to Dismiss, filed by Omega on April 26, 2006, the Staff's prayer in Count II of the Staff's Complaint is barred by Article VI, Cl. 2 of the United States Constitution in that the Commission may not regulate Omega's business with the Department of Defense for the provision of utility service at Fort Leonard Wood because such activities are governed exclusively by federal procurement law.

WHEREFORE, Omega requests that the Complaint be dismissed without further proceedings and grant such other relief as it deems appropriate.

Respectfully submitted,

EDGAR LAW FIRM LLC



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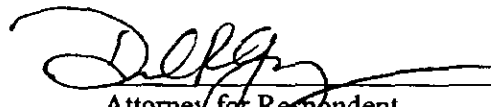
**ATTORNEY FOR OMEGA
OMEGA PIPELINE COMPANY, LLC**

Dated: May 10, 2006

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Answer to Complaint has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 11th day of May, 2006, to:

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