STATE OF MISSOURI MISSOURI PUBLIC SERVICE COMMISSION

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In the Matter of Missouri Gas Energy's Increasing Rates for Gas Service Provided to Customers in the Company's Missouri Service Area.

Case No. GR-2006-0422

PREHEARING BRIEF OF JACKSON COUNTY, UNIVERSITY OF MISSOURI - KC AND CENTRAL MISSOURI STATE UNIVERSITY

COMES NOW the County of Jackson, Missouri ("Jackson County"), the University of Missouri - Kansas City ("UMKC") and Central Missouri State University ("CMSU"), hereinafter collectively known as "the parties", and for their Prehearing Brief state as follows:

1. Since neither Jackson County, UMKC nor CMSU offered any technical witnesses in this case and due to their limited involvement herein, the parties have no position on the issues set forth in the List of Issues with the exception of the Rate Design issue in which they were signatory parties to the Partial Nonunanimous Stipulation and Agreement concerning Class Cost of Service filed on December 8, 2006, which they support and pray that the Commission will issue its order approving same.

2. With respect to all the revenue requirement issues, the parties are generally supportive of the positions taken by the PSC Staff.

3. The parties reserve their right, as parties herein, to fully participate in the evidentiary hearings to be held herein and to fully participate in any pre-hearing and posthearing proceedings as necessary.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

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ATTORNEYS FOR COUNTY OF JACKSON, MISSOURI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email to all parties of record.

Dated: December 18, 2006

<u>/s/ Jeremiah D. Finnegan</u> Jeremiah D. Finnegan