

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

In the Matter of the Application of )  
Missouri Gas Energy for the Issuance of )  
an Accounting Authority Relating to its ) **Case No. GU-2011-0392**  
Natural Gas Operations and for a )  
Contingent Waiver of the Notice )  
Requirement of 4 CSR 240-4.020(2). )

**STIPULATION OF FACTS, ORDER OF WITNESSES,  
AND ORDER OF CROSS EXAMINATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), Missouri Gas Energy (“MGE” or “Company”), and the Office of the Public Counsel (“OPC”), being all of the parties in this case, and jointly state as follows:

1. On October 4, 2011, the Missouri Public Service Commission (“Commission”) issued its *Notice of Hearing and Order Setting Procedural Schedule* (“Order”) which, *inter alia*, ordered Staff to file a Stipulation of Facts, Order of Witnesses and Order of Cross Examination “on behalf of all parties if all parties agree” by November 22, 2011.

2. In response to the Commission’s *Order*, the parties jointly file the following:

**Stipulation of Facts**

1. The Company is a division of Southern Union Company, which is duly incorporated under the laws of the State of Delaware and conducts business in Missouri under the fictitious name of “Missouri Gas Energy.” The Company’s principal office is located at 3420 Broadway, Kansas City, Missouri 64111.

2. The Company’s corporate parent, Southern Union Company, is authorized to do business in Missouri as a foreign corporation.

3. The Company provides natural gas services to approximately 500,000 customers in 29 Missouri counties. Of that total, for the April 2011 billing month MGE served 16,165 customers in the City of Joplin, Missouri, and 533 customers in the nearby City of Duquesne, Missouri.

4. On June 10, 2011, the Company filed an Application with the Missouri Public Service Commission that asked the Commission to issue an accounting authority order to allow MGE to defer to Account 182.3, Other Regulatory Assets, (i) Operations and Maintenance and capital expenditures incurred for repair, restoration, and rebuild activities due to the tornado, including depreciation and carrying charges on those expenditures equal to the Company's Allowance for Funds Used During Construction rate, and (ii) revenue losses (revenues MGE expected to recover from customers that lost service) due to the tornado, including carrying charges equal to the Allowance for Funds Used During Construction rate.

**Order of Witnesses**

**MGE:** Michael R. Noack, Frank J. Hanley  
**Staff:** Amanda C. McMellen, Mark L. Oligschlaeger  
**OPC:** Shawn Lafferty

**Order of Cross Examination**

**For MGE Witnesses:** Staff, OPC  
**For Staff Witnesses:** OPC, MGE  
**For OPC Witness:** Staff, MGE

**WHEREFORE** the parties submit their Stipulation of Facts, Order of Witnesses and Order of Cross Examination in response to the Commission's October 4, 2011, *Order*.

Respectfully submitted,

Missouri Gas Energy

**/s/ Russell Mitten**

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The Staff of the  
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**/s/ Goldie Tompkins**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 22nd day of November, 2011.

**/s/ Goldie Tompkins**