

Exhibit No.:
Issue: Tariff File No. 9700571
Witness: Michael W. Straub
Sponsoring Party: MoPSC Staff
Type of Exhibit: Rebuttal Testimony
Case No.: GA-2007-0289
Date Testimony Prepared: September 7, 2007

MISSOURI PUBLIC SERVICE COMMISSION
UTILITY SERVICES DIVISION

REBUTTAL TESTIMONY

OF

MICHAEL W. STRAUB

MISSOURI GAS ENERGY,
a division of SOUTHERN UNION COMPANY

CASE NO. GA-2007-0289

Jefferson City, Missouri
September, 2007

Staff
Exhibit No. 20
Case No(s). GA-2007-0289
Date 10/25/07 Rptr LV

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MICHAEL W. STRAUB
MISSOURI GAS ENERGY,
a division of SOUTHERN UNION COMPANY
CASE NO. GA-2007-0289

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1 Q. Have you previously testified before this Commission?

2 A. Yes, I have. The cases in which I have submitted testimony are listed in
3 Schedule 1.

4 **EXECUTIVE SUMMARY**

5 Q. What is the purpose of your testimony in this case?

6 A. I will be rebutting a portion of Michael R. Noack's direct testimony in this
7 case regarding the Missouri Public Service Commission Staff (Staff) Recommendation
8 relating to File No. 9700571, approved by the Commission on May 14, 1997. The file as
9 circulated to the Commission is attached as Schedule 2 to this testimony, even though only
10 the Utility Operations Division Routing Slip, an excerpt of the file, is attached to
11 Mr. Noack's Direct Testimony as Exhibit A.

12 **MGE TARIFF FILING, FILE NO. 9700571**

13 Q. On page 3, line 7, through line 18, of Mr. Noack's Direct Testimony, he
14 discusses tariff filing (File No. 9700571) implementing the service area description in the
15 Missouri Gas Energy (MGE) tariff. Would you please explain the Staff role in this tariff
16 filing?

17 A. Yes. This filing was the result of a commitment made by MGE in Case
18 No. GR-96-285, to file tariff sheets with metes and bounds descriptions and maps showing
19 certificated service areas in the State of Missouri. Attached as Schedule 3 is a copy of
20 page 80 of the Commission's Report and Order in Case No. GR-96-285, issued
21 January 22, 1997, discussing this commitment. MGE filed those tariff sheets on
22 February 21, 1997. The Staff then reviewed the tariff filing and determined whether it would
23 recommend approval or suspension of the tariff filing to the Commission. Staff

Rebuttal Testimony of
Michael W. Straub

1 recommended approval, and the Commissioners voted to approve the filing on May 14, 1997.

2 The tariff sheets became effective on May 21, 1997.

3 Q. Mr. Straub, what was your role related to File No. 9700571?

4 A. At the time of this filing I was the Assistant Manager-Rates,
5 Energy Department. As the Assistant Manager-Rates I assigned File No. 9700571 to a staff
6 member working in the section and I had supervisory responsibility for the person that was
7 assigned to review the material and information necessary to develop the Staff
8 recommendation.

9 Q. Would you please describe the review process for tariff filings?

10 A. Yes. The review would vary with the filing, some filings required nothing
11 more than reviewing the tariff sheet to ensure it contained the language stated in the
12 Commission Order and writing a recommendation for approval. In other cases, the filing
13 might require extensive review and analysis of significant amounts of information before
14 developing the Staff recommendation.

15 With regard to File No. 9700571, the total amount of information used in the
16 development and review of the proposed tariff sheets consisted of Commission Orders issued
17 from November 22, 1935, through April 18, 1995, in 79 MGE certificates of convenience
18 and necessity (CCN) cases. From these 79 CCN cases and MGE service orders, it was
19 determined that MGE had facilities in 31 counties, 101 townships, 245 ranges, and
20 2,901 sections.

21 Q. Would you please state the purpose of File No. 9700571 and why it was
22 necessary?

Rebuttal Testimony of
Michael W. Straub

1 A. Yes. The purpose of File No. 9700571 was to place in the Company's tariff a
2 description of its Commission authorized service area as required by Commission Rule 4
3 CSR 240-2.060, which was in effect at the time of the filing. At that time, several regulated
4 gas and electric utilities did not have in their tariffs a description of its authorized service
5 area. As utility services were expanding outward with growing city boundaries, it was
6 becoming increasingly difficult to determine if a utility had a CCN to serve in these new
7 areas. This was especially true if two utilities were expanding towards each other, or if they
8 were already in close proximity.

9 During that period of time when utilities filed rate cases, Staff would determine
10 whether the utility's tariff contained the certificated service area description and, if it did not,
11 then Staff would work with the utility to seek clarification of its service areas within the
12 context of the rate case.

13 Q. Did you write the hand written sentence at the end of the Utility Operations
14 Division Routing Slip of File No. 9700571 and if so would you please explain why?

15 A. Yes, I wrote the hand written sentence. This sentence is the result of
16 discussions I had with the Commissioners and my response to questions from the
17 Commissioners during the agenda on May 14, 1997. Based on my memory, the discussion
18 and question centered on the purpose of File No. 9700571 and whether or not it expanded the
19 certificated service area of MGE. After the discussion, the Chairman handed me the filing
20 and asked that I add a sentence at the end of the Energy Routing Slip reflecting my response.

21 Q. In your opinion, did MGE also understand the purpose of File No. 9700571
22 was the clarification of MGE's then current service area in the tariff?

1 A. Yes. The first sentence, in the second paragraph of the MGE cover letter,
2 dated February 20, 1997, (attached Schedule 2-6) states "MGE files these tariff sheets to
3 clarify the geographic boundaries of its service area as the Commission has directed by its
4 orders in Case Nos. GA-96-130 and GR-96-285." Accordingly, MGE developed the tariff
5 sheets, Staff reviewed and processed them, and the Commission approved this filing with the
6 result of clarifying within the filed tariff MGE's then current service area.

7 Q. If the now current tariff sheets of MGE contain sections listed as service areas
8 that were mistakenly included in File No. 9700571, would this automatically grant MGE a
9 CCN to provide gas service in those sections?

10 A. No. Based on my Commission experience working in the area of rates and
11 tariffs, an error in the tariff does not automatically allow or grant something to a regulated
12 utility. In the case of File No. 9700571, it would not grant MGE a CCN to provide service in
13 any sections mistakenly listed. Although errors do not happen often, they do sometimes
14 occur, and when discovered, they should be corrected as soon as possible. As I stated earlier
15 in this testimony, the development and review of File No. 9700571 was very extensive, and
16 because there are three main types of CCN granted by the Commission, it would be very easy
17 to misread or misapply a section.

18 Q. Would you please explain the three main types of CCN to which you are
19 referring?

20 A. Yes. One type of certificate is the request to construct, install, own, operate,
21 control, manage and maintain a distribution system to provide service along and a reasonable
22 distance from a specific distribution line. This type of certificate is referred to as a line
23 certificate.

1 A second type of certificate is the request to construct, install, own, operate, control,
2 manage and maintain a distribution system to provide service in a specific service area, with
3 the requested service area being defined by a metes and bounds, or township, range and
4 section format. This type of certificate is referred to as an area certificate.

5 Another type of certificate is the request to own, construct, operate and maintain
6 facilities for the purpose of transporting the energy (gas or electricity) from its origin or one
7 portion of the Local Distribution Company (LDC) service area to another portion of its
8 service area. This type of certificate is necessary if the LDC has transportation or supply
9 facilities located outside its authorized service area and it does not automatically allow the
10 LDC to provide service from these transportation only facilities to customers that may be
11 located in or near the area. Therefore, some sections may have contained MGE facilities but
12 only because they were traversing the section. The main difference between this certificate
13 and the line certificate is this type of certificate is for the purpose of transporting the energy
14 through the area and the purpose of the line certificate is for serving customers along and
15 close to the line.

16 Q. If an error is discovered in a Commission approved tariff sheet, how can it be
17 corrected?

18 A. If both the Company and Staff agree that a tariff sheet contains an inadvertent
19 error, then it is easily corrected with the Company filing a 30 day tariff filing with the correct
20 information contained in the tariff sheet. Staff can then recommend the Commission approve
21 the corrected tariff sheet. However, if either party believes the tariff sheet in question was
22 not an inadvertent error, then both have the ability to bring the tariff in question before the

Rebuttal Testimony of
Michael W. Straub

1 Commission. Staff may file a complaint case against the Company and the Company may
2 file a corrected tariff sheet.

3 Q. If an error is discovered in File No. 9700571 during the context of this case,
4 how can it be corrected?

5 A. The Commission may correct the error or errors in its report and order by
6 ordering either or both MGE and Empire District Gas Company (EDG) to file tariff sheets to
7 comply with its findings. Staff witness Henry Warren will be providing all Staff
8 recommendations in his rebuttal testimony.

9 Q. Does this conclude your rebuttal testimony?

10 A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the application of Missouri Gas Energy,)
a division of Southern Union Company, for a certificate)
of public convenience and necessity authorizing it to)
construct, install, own, operate, control, manage and)
maintain a natural gas distribution system to provide gas)
service in Platte County, Missouri, as an expansion of its)
existing certified area.)

Case No. GA-2007-0289

AFFIDAVIT OF MICHAEL W. STRAUB

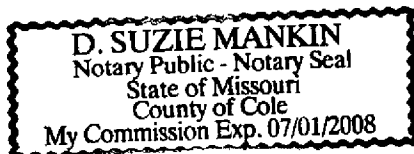
STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

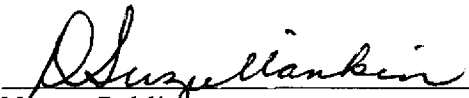
Michael W. Straub, of lawful age, on his oath states: that he has participated in the preparation of the foregoing Rebuttal Testimony in question and answer form, consisting of 7 pages to be presented in the above case; that the answers in the foregoing Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of his knowledge and belief.



Michael W. Straub

Subscribed and sworn to before me this 6th day of September 2007.





Notary Public

**MISSOURI GAS ENERGY,
a division of SOUTHERN UNION COMPANY**

CASE NO. GA-2007-0289

CASES IN WHICH MICHAEL W. STRAUB FILED TESTIMONY

<u>Company Name</u>	<u>Case Number</u>
Missouri Gas Energy	GR-98-140
United Cities Gas Company	GO-97-410
Missouri Gas Energy	GO-97-409
Citizens Electric Corporation	ER-97-286
Union Electric Company	EC-96-255
Kansas City Power & Light Company	EC-96-57
Kansas City Power & Light Company	EO-95-181
Union Electric Company	ET-95-209
Union Electric Company	EC-95-58
Laclede Gas Company	GR-94-220
St. Joseph Light & Power Company	ER-94-163
Union Electric Company	EC-91-277
Union Electric Company	EC-92-276
Kansas City Power & Light Company	ER-92-181
Union Electric Company	EC-91-349
Trigen-Kansas City District Energy Corporation	HA-90-5
Kansas City Power & Light Company	HM-90-4
St. Joseph Light & Power Company	HR-88-116
Boone Electric Service Company	EA-87-99
Consolidated Electric Service Company	EA-87-85
Sho-Me Power Corporation	EA-87-47
Kansas City Power & Light Company	ER-85-128
Union Electric Company	ER-84-168
Union Electric Company	EM-83-248
Missouri Public Service Company	ER-83-40
Missouri Utilities Company	ER-82-246
Missouri Public Service Company	ER-82-213
Kansas City Power & Light Company	ER-82-67
Kansas City Power & Light Company	ER-82-66
Missouri Utilities Company	ER-81-346
Missouri Edison Company	ER-81-276
Missouri Public Service Company	ER-81-154
Sho-Me Power Corporation	ER-81-115
Missouri Public Service Company	ER-81-85
St. Joseph Light & Power Company	HR-81-45
St. Joseph Light & Power Company	ER-81-43
Missouri Public Service Company	ER-80-231

<u>Company Name</u>	<u>Case Number</u>
Missouri Utilities Company	ER-80-215
Kansas City Power & Light Company	ER-80-204
Peoples Natural Gas Division	GR-80-155
Kansas City Power & Light Company	ER-80-48
The Gas Service Company	GR-79-114
Sho-Me Power Corporation	ER-79-106
Missouri Public Service Company	ER-79-61
Missouri Public Service Company	ER-79-60
Glenwood Light & Power Company	ER-78-300
Sho-Me Power Corporation	ER-79-37
Sho-Me Power Corporation	ER-78-293
Sho-Me Power Corporation	ER-78-272
The Empire District Electric Company	ER-77-210

UTILITY OPERATIONS DIVISION ROUTING SLIP

File No. 9700571

To: Chair Zobrist Commissioner Crumpton Vice Chair Drainer Agenda Date: <u>5/14</u> Final Agenda: May 20, 1997 Commission Action: Approve <input checked="" type="checkbox"/> Suspend <input type="checkbox"/>		Assigned: From: Initial Date Revised Mr. McDuffey <u>mdm 5-9-97</u> <u>5-9-97</u> Mr. Straub <u>absent</u> Mr. Matisziw <u>RM 5/14/97</u> Mr. Goldammer <u>RG 5/14/97</u> Legal <u>RLD 5/12/97</u> Staff Deadline: May 12, 1997; 5:00pm Staff Recommends: Approval <input checked="" type="checkbox"/> Suspension <input type="checkbox"/>	
--	--	---	--

30-ALAM

Company: Missouri Gas Energy
 Effective Date: May 21, 1997
 Purpose: Implement tariff sheets to clarify its service area

On February 21, 1997, Missouri Gas Energy (MGE or Company) of Kansas City, Missouri filed tariff sheets to clarify the geographic boundaries of its service area. On April 11, 1997, MGE requested a thirty (30) day extension of the effective date to May 21, 1997 at the request of the Missouri Public Service Commission Staff (Staff) for additional time to investigate and review the tariffs. The proposed tariff sheets will be located in the section titled "Index of Certificated Areas".

The Commission Rule 4 CSR 240-2.060 (Rule) requires a metes and bounds description of the certificated service area. Company filed these tariff sheets to comply with the Rule and to reflect the Missouri Public Service Commission (Commission) orders issued in Case Nos. GA-96-130 and GR-96-285. The order in Case No. GA-96-130 states that MGE and the Staff are to cooperate in preparing tariff sheets setting out the plat and legal description of the current and complete service area of MGE. The order in Case No. GR-96-285 states that MGE has committed to filing tariff sheets by February 28, 1997 with metes and bounds descriptions and maps showing certificated service areas in the State of Missouri.

Staff and Company have reviewed certificates of convenience and necessity (CCN) cases and Company service orders in the development of the proposed tariff sheets. The CCN cases were granted in either a transmission or service area certificate making the development of a service area stated in a metes and bounds format very difficult. Therefore, the description of the Company's proposed service area was developed by listing the service area by township, range and section. The township, range and section format is utilized by other regulated energy utilities under the jurisdiction of the Commission. In Staff's opinion a township, range and section format satisfies the Rule, therefore Staff has no objection to this format.

MGE has not filed tariff sheets containing a map of its service territory. MGE is working on a process that will transfer to a tariff sheet its service area maps and still maintain its legibility. MGE plans to file the tariff sheets containing the maps by June 1, 1997.

Energy Routing Slip, File No. 9700571
Missouri Gas Energy. Page 2 of 2

The Commission's Energy - Rates Staff has reviewed this filing and has no objections to the proposed tariff sheets. Because this filing was made on greater than thirty (30) days notice, no order is necessary to indicate approval. Staff is unaware of any issue currently pending before the Commission which affects or is affected by this filing. Therefore, Staff has no objections to allowing the following tariff sheets, as filed on February 21, 1997, and extended on April 11, 1997, to go into effect on and after May 21, 1997, the requested effective date:

P.S.C. MO. No. 1

First Revised SHEET No. 6 Canceling Original SHEET No. 6

Original SHEET No. 6.1
Original SHEET No. 6.2
Original SHEET No. 6.3
Original SHEET No. 6.4
Original SHEET No. 6.5
Original SHEET No. 6.6
Original SHEET No. 6.7
Original SHEET No. 6.8
Original SHEET No. 6.9
Original SHEET No. 6.10
Original SHEET No. 6.11
Original SHEET No. 6.12
Original SHEET No. 6.13
Original SHEET No. 6.14
Original SHEET No. 6.15
Original SHEET No. 6.16

The purpose of this filing is to show the company's current service ~~land~~ area, and does not expand to any area that it currently does not serve.
7/14/97
5/14/97

Post-It® Fax Note		7671	Date	5-19-97	# of pages	2
To	R. H. Hark		From	Hark in Xiffes		
Co./Dept	MGE Attorney		Co.	MPSC		
Phone #	816-360-5255		Phone #	523-751-7507		
Fax #	816-360-5554		Fax #	523-751-1847		



MISSOURI GAS ENERGY

3420 Broadway, • Kansas City, MO • 64111-2404 • (816) 360-5605

CHARLES B. HERNANDEZ

DIRECTOR, PRICING AND REGULATORY AFFAIRS

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MAY 30 1997

Records
Public Service Commission

FILED

May 29, 1997

MISSOURI
PUBLIC SERVICE COMMISSION

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
301 West High Street
Jefferson City, Missouri 65102-0360

Dear Mr. Wright:

Transmitted herewith are three copies of the following tariff sheets:

1. P.S.C.MO. No. 1, First Revised Sheet No. 2, canceling, P.S.C.MO. No. 1, Original Sheet No. 2,
2. P.S.C.MO. No. 1, First Revised Sheet No. 7, canceling, P.S.C.MO. No. 1, Original Sheet No. 7,
and
3. P.S.C.MO. No. 1, First Revised Sheet No. 8, canceling, P.S.C.MO. No. 1, Original Sheet No. 8.

These revised tariff sheets are being filed to include in the Company's tariff maps of the Company's certificated service area as well as necessary changes to the tariff index.

Please forward copies of any Commission order or notice associated with this filing to:

Robert J. Hack
Senior Attorney
Missouri Gas Energy
3420 Broadway
Kansas City, Missouri 64111
(816) 360-5755

Mr. Charles B. Hernandez
Director, Pricing and Regulatory Affairs
Missouri Gas Energy
3420 Broadway
Kansas City, Missouri 64111
(816) 360-5605

Sincerely,

cc: Office of Public Counsel
Robert J. Hack - MGE

5700811 *this sheet
body of letter
sent*



Commissioners
KARL ZIMMIST
Chair

KENNETH MCCLURE
DUNCAN E. KINCHELOE
HAROLD CRUMPTON
M. DIANNE DRAINER
Vice Chair

Missouri Public Service Commission

POST OFFICE BOX 368
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
573-526-5695 (TT)

May 14, 1997

CECIL I. WRIGHT
Executive Secretary
SAM GOLDAMMER
Director, Utility Operations
GORDON L. PERSINGER
Director, Policy & Planning
KENNETH J. RADEMAN
Director, Utility Services
DONNA M. PRENGER
Director, Administration
DALE HARDY ROBERTS
Chief Administrative Law Judge
STEVEN DOTTHEIM
Acting General Counsel

Robert Hack
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111 2404

RE: File Number 9700571

Dear Mr. Hack:

This correspondence is to advise that the tariff filing submitted with your letter of transmittal, a copy of which is enclosed herewith, is being made effective in accordance with 393.140 (11) RSMo, 1994.

A copy of the tariff filing, reflecting the filing record of this Commission, is enclosed for your use.

Sincerely,

Cecil I. Wright
Executive Secretary

CIW:njm

Enclosure



MISSOURI GAS ENERGY

3420 Broadway, • Kansas City, MO • 64111-2404 • (816) 360-5755

ROBERT J. HACK
SENIOR ATTORNEY

April 10, 1997

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Tariff File #9700571

Dear Mr. Wright:

The tariff sheets in the above-referenced file, which describe the company's service area, currently bear a proposed effective date of April 21, 1997. Pursuant to the request of the Commission's staff, Missouri Gas Energy respectfully requests that the proposed effective date of these tariff sheets be extended for thirty (30) days, until May 21, 1997.

Thank you in advance for your attention to this matter. If you have any questions or need additional information, please call me at (816) 360-5755.

Sincerely,

cc: Mack McDuffey
Office of the Public Counsel
Charley Hernandez

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APR 11 1997

Records
Public Service Commission



MISSOURI GAS ENERGY

3420 Broadway, • Kansas City, MO • 64111-2404 • (816) 350-5755

ROBERT J. HACK
SENIOR ATTORNEY

February 20, 1997

VIA FEDERAL EXPRESS

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
301 W. High, Suite 530
Jefferson City, Missouri 65102

RECEIVE
FEB 21 1997

Records
Public Service Commission

Dear Mr. Wright:

Transmitted herewith are three (3) copies of P.S.C. Mo. No. 1 First Revised Sheet No. 6, canceling Original Sheet No. 6 and Original Sheet Nos. 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.10, 6.11, 6.12, 6.13, 6.14, 6.15 and 6.16. These tariff sheets bear an issue date of February 21, 1997, and an effective date of April 21, 1997. Also enclosed are three (3) copies of maps depicting the northern and southern regions of MGE's service territory.

MGE files these tariff sheets to clarify the geographic boundaries of its service area as the Commission has directed by its orders in Case Nos. GA-96-130 and GR-96-285. MGE has not filed the maps in tariff sheet format because the reduction necessary to do so would make such maps of questionable utility. We continue to pursue putting these maps in tariff sheet format and will file them in that fashion if the Commission so desires.

Although MGE files these tariff sheets pursuant to Commission directive, they are not, technically speaking, a compliance filing as that phrase has come to be understood. This filing, therefore, should be assigned a file number and treated as a "normal" tariff filing. Nevertheless, because this filing meets the Commission's directive as expressed in the cases listed above, MGE asks that a copy of this cover letter be placed in each case file (GA-96-130 and GR-96-285). Sufficient copies of this letter are enclosed for that purpose.

Please bring this filing to the attention of the Commission for approval. In addition, please forward copies of any Commission Order or notice associated with this filing to:

9700571

Charles B. Hernandez
Director, Pricing and Regulatory Affairs
Missouri Gas Energy
3420 Broadway
Kansas City, Missouri 64111
(816) 360-5605

Robert J. Hack
Senior Attorney
Missouri Gas Energy
3420 Broadway
Kansas City, Missouri 64111
(816) 360-5755

Sincerely,



RJH/sni

enclosure(s)

cc: Office of the Public Counsel

Revised

P.S.C. MO. No. 1
Canceling P.S.C. MO. No. 1

First Revised
Original

SHEET No. 8
SHEET No. 6

Missouri Gas Energy,
a Division of Southern Union Company

For All Missouri Service Areas

INDEX OF CERTIFICATED AREAS

<u>TOWNSHIP</u>	<u>RANGE</u>	<u>SECTIONS</u>
<u>ANDREW COUNTY</u>		
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<u>BARRY COUNTY</u>		
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T26n	R28w	36
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DATE OF ISSUE February 21 1997
month day year

DATE EFFECTIVE April 21 1997
month day year

ISSUED BY: Charles B. Hernandez

Director, Pricing & Regulatory Affairs
Missouri Gas Energy
Kansas City, MO. 64111

Missouri Gas Energy,
a Division of Southern Union Company

For All Missouri Service Areas

INDEX OF CERTIFICATED AREAS

TOWNSHIP RANGE SECTIONS

BARTON COUNTY

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T58n	R38w	36

DATE OF ISSUE February 21, 1997
month day year

DATE EFFECTIVE April 21, 1997
month day year

ISSUED BY: Charles B. Hernandez

Director, Pricing & Regulatory Affairs
Missouri Gas Energy
Kansas City, MO. 64111

Missouri Gas Energy,
a Division of Southern Union Company

For All Missouri Service Areas

INDEX OF CERTIFICATED AREAS

TOWNSHIP RANGE SECTIONS

CARROLL COUNTY

T52n	R23w	4,5,8,9
T52n	R25w	22,23
T53n	R23w	28,29,30,31,32,33

CASS COUNTY

T42n	R33w	4,5,6,7,8,9
T43n	R29w	6
T43n	R30w	1,2
T43n	R33w	29,30,31,32
T44n	R29w	18,19,30,31
T44n	R30w	2,3,4,9,10,11,13,14,15,16,21,22,23,24,25,26,27,28,35,36
T44n	R31w	2,3,4,5,6
T44n	R32w	6,7,8,18
T44n	R33w	5,6,8,12,13,17,18,19,20,29,30,32
T45n	R30w	13,14,15,16,21,22,23,24,25,26,27,28,33,34,35,36
T45n	R31w	28,29,32,33,34,35
T45n	R32w	3,4,7,8,9,10,15,16,17,18
T45n	R33w	32,33
T46n	R30w	4,5,6,7,8,9,16,17,18,19,20,21
T46n	R31w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17
T46n	R32w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,30
T46n	R33w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30

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CEDAR COUNTY

T33n	R26w	3,4,5,6,7,8,9,10
T33n	R27w	1,2,3,4,5,6,7,8,9,10,11,12
T33n	R28w	1,2,3,4,5,6,7,8,9,10,11,12,15,16,17,18,19,20,21,22
T34n	R26w	3,4,5,6,7,8,9,10,15,16,17,18,19,20,21,22,27,28,29,30,31,32,33,34
T34n	R27w	23,24,25,26,31,32,33,34,35,36
T34n	R28w	4,5,6,7,8,9,16,17,18,19,20,21,28,29,30,31,32,33,34,35,36
T35n	R28w	3,4,5,8,9,10,15,16,17,20,21,22,27,28,29,32,33,34
T38n	R28w	15,16,17,20,21,22,27,28,29,32,33,34

CHRISTIAN COUNTY

T27n	R21w	2,3,4,5,6,7,8,9,10,11,13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,33,34,35,36
T27n	R22w	1,2,3,10,11,12,13,14,15,22,23,24,25,26,35,36
T27n	R23w	7,8,9,16,17,18,19,20,21,28,29,30
T27n	R24w	3,4,9,10,11,12,13,14,15,16,17,20,21,22,23,24,28,29,32,33
T28n	R21w	31,32,33,34
T28n	R22w	33,34,35,36

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T50n	R31w	2,3,7,10,11,18
T50n	R32w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,17,18,23,24
T50n	R33w	1,2,3,10,11,12,13,14,21,22,23,24,26,27,28
T51n	R30w	5,6
T51n	R31w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T51n	R32w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T51n	R33w	1,2,3,10,11,12,13,14,15,22,23,24,25,26,27,34,35,36
T52n	R30w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 29,30,31,32
T52n	R31w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T52n	R32w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T52n	R33w	1,2,3,10,11,12,13,14,15,22,23,24,25,26,27,34,35,36
T53n	R30w	1,2,12,13,14,18,19,20,21,22,23,24,25,26,27,28,29,30,31,32, 33,34,35,36
T53n	R31w	1,2,11,12,13,14,15,18,21,22,23,24,25,26,27,28,29,30,31,32, 33,34,35,36
T53n	R32w	25,26,27,28,29,30,31,32,33,34,35,36
T53n	R33w	1,2,3,10,11,12,13,14,15,22,23,24,25,26,27,34,35,36
T54n	R30w	35,36
T54n	R31w	35,36
T54n	R33w	34,35,36

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T54n	R33w	1,2,3,10,11,12,13,14,15,22,23,24,25,26,27
T55n	R30w	6,7,18,19,30,31
T55n	R31w	1,12,13,23,24,25,26,35,36,
T55n	R33w	1,2,3,10,11,12,13,14,15,22,23,24,25,26,27,34,35,36
T56n	R30w	3,4,5,8,9,10,15,16,17,19,20,21,22,28,29,30,31,32,33
T56n	R31w	24,25,36
T56n	R33w	25,28,27,34,35,36
T57n	R30w	19,20,21,22,23,24,25,26,27,28,33,34
T57n	R31w	19,20,21,22,23,24
T57n	R32w	20,21,22,23,24

COOPER COUNTY

T47n	R18w	4,5
T48n	R18w	32,33

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T30n	R26w	5,6
T30n	R27w	1,2,3,4,5,6
T30n	R28w	1,2,3,4,5,6
T30n	R29w	1
T31n	R28w	7,8,17,18,19,20,29,30,31,32
T31n	R27w	11,12,13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29, 30,31,32,33,34,35,36
T31n	R28w	3,4,5,6,7,8,9,10,13,14,15,16,17,18,19,20,21,22,23,24,25,26, 27,28,29,30,31,32,33,34,35,36
T31n	R29w	24,25,36
T32n	R28w	3,4,5,6,7,8,9,10,15,16,17,18,19,20,21,22,27,28,29,30,31,32, 33,34
T33n	R28w	27,28,29,30,31,32,33,34

DEKALB COUNTY

T57n	R30w	11,12,13,14,15,16,17,18
T57n	R31w	7,8,9,10,11,13,14,15,16,17,18
T57n	R32w	8,9,10,11,12,13,14,15,15,17

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GREENE COUNTY		
T28n	R21w	30
T28n	R22w	13, 14, 23, 24, 25
T28n	R23w	2, 3, 10, 11, 14, 15, 18, 17, 18, 19, 20, 21, 22, 23, 29, 30
T28n	R24w	24
T29n	R23w	2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 28, 27 28, 29, 30, 34, 35
T29n	R24w	1, 2, 3, 4, 12, 13, 24, 25
T30n	R23w	19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
T30n	R24w	1, 2, 3, 4, 5, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 35, 36
T31n	R24w	13, 14, 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 32, 33, 34, 35, 36
HENRY COUNTY		
T43n	R24w	1, 2, 11, 12
T44n	R24w	35, 36
HOWARD COUNTY		
T50n	R16w	1, 2, 3, 10, 11, 12, 13, 14, 15, 23, 24
T51n	R16w	2, 3, 4, 9, 10, 11, 14, 15, 16, 17, 20, 21, 22, 23, 26, 27, 28, 29, 34, 35, 36
T52n	R16w	26, 27, 28, 33, 34, 35

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T47n	R30w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26
T47n	R31w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35
T47n	R32w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
T47n	R33w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
T48n	R29w	4, 5, 6, 8, 9
T48n	R30w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
T48	R31w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
T48n	R32w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36
T48n	R33w	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36

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T49n	R30w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T49n	R31w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T49n	R32w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T49n	R33w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T50n	R30w	13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31, 32,33,34,35,36
T50n	R31w	8,9,10,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31, 32,33,34,35,36
T50n	R32w	4,5,6,7,8,9,13,14,17,18,22,23,24,25,26,27,28,29,30,31,32, 33,34,35,36
T50n	R33w	1,2,3,4,5,8,9,10,11,12,13,14,16,21,22,23,24,25,26,27,28, 31,32,33,34,35,36
T51n	R31w	32,33

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T27n	R32w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18
T27n	R33w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18
T27n	R34w	1,2,11,12,13,14
T28n	R30w	6,7,18
T28n	R31w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22
T28n	R32w	1,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,24,25, 26,27,28,29,30,31,32,33,34,35,36
T28n	R33w	2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T28n	R34w	1,2,3,10,11,12,13,14,15,22,23,24,25,26,35,36
T29n	R30w	31
T29n	R31w	4,5,8,9,16,17,20,21,28,29,31,32,33,34,35,36
T29n	R32w	5,8,9,10,15,16,17,36
T29n	R33w	31,32,33
T29n	R34w	34,35,36
T30n	R30w	18,19
T30n	R31w	13,14,15,22,23,24,25,26,27,34,35

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T45n	R26w	1
T45n	R28w	2,3,6,10,11,14,15
T45n	R29w	1
T46n	R24w	14,15,16,21,22,23,27,28,33,34,35
T46n	R25w	17,18,19,20,29,30,31,32,33,34,35,36
T46n	R26w	11,12,13,14,15,16,17,20,21,22,23,24,25,26,27,35,36
T46n	R27w	25,36
T46n	R28w	31
T46n	R29w	36

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T48n	R27w	6,7
T48n	R28w	1,2,3,4,5,6,11,12
T48n	R29w	1,2,3,10
T49n	R24w	32,33
T49n	R25w	6
T49n	R26w	1,2,11,12
T49n	R27w	31
T49n	R28w	31,32,33,34,35,36
T49n	R29w	34,35,36
T50n	R24w	24,25,27,28,33,34
T50n	R25w	26,30,31,32
T50n	R26w	25,36
T51n	R24w	14,15,22,23

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T26n	R26w	1,2,4,8,9,11,12,13,14,16,17,23,24
T26n	R27w	5,8,17,19,20,21,28,29,30
T26n	R28w	16,20,21,25,26,28,29
T27n	R25w	25,34,35,36
T27n	R26w	5,6,8,16,17,21,28,33
T27n	R27w	28,29,32
T28n	R26w	29,30,31,32
T28n	R27w	25,36

MCDONALD COUNTY

T21n	R31w	7
T21n	R32w	2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,21,22
T21n	R33w	1,2,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23,24, 25,26,27,34,35,36
T21n	R34w	3,4,9,10,11,13,14,15,16,21,22,23,24,27,28,33,34
T22n	R32w	4,5,6,7,8,9,16,17,18,19,20,21,26,27,28,29,30,31, 32,33,34,35,36
T22n	R33w	1,2,11,12,13,14,23,24,25,26,35,36
T22n	R34w	27,28,33,34
T23n	R32w	4,5,6,7,8,9,16,17,18,19,20,21,28,29,30,31,32,33
T23n	R33w	1,12,13,24,25,36

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T46n	R17w	14,15,16,21,22

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T24n	R32w	4,5,8,9,10,11,14,15,16,17,20,21,22,23
T24n	R34w	8,9
T25n	R31w	18,19,20,29,30,31,32
T25n	R32w	13,14,15,22,23,24,25,26,35,36
T25n	R34w	1,2,11,12,13,14,23,24,25,26,35,36
T26n	R29w	2,3,5,10,11
T26n	R31w	3,4,9,10,16
T26n	R32w	5,6,7,8,9
T26n	R33w	1,2,3,4,5,6,7,8,9,10,11,12
T26n	R34w	1,2,11,12,13,14,23,24,25,26,35,36
T27n	R29w	20,29,32
T27n	R32w	19,20,21,29,30,31,32
T27n	R33w	19,20,21,22,23,24,25,26,27,28,29,30,31,32,33,34,35,36
T27n	R34w	23,24,25,26,35,36

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T44n	R23w	31
T46n	R23w	11,14,15,22,23
T47n	R22w	13,14,23,24,25,26
T48n	R22w	32

PLATTE COUNTY

T50n	R33w	4,5,6,7,8,9
T51n	R33w	4,5,6,7,8,9,16,17,18,19,20,21,28,29,30,31,32,33
T51n	R34w	1,2,3,4,5,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22,23, 24,25,26,27,28,29,30,31,32,33,34,35,36
T51n	R35w	11,12
T52n	R33w	4,5,7,8,9,16,17,18,19,20,21,28,29,30,31,32,33
T52n	R34w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,25,26,27,28,29,30,31,32,33,34,35,36
T52n	R35w	1,2,3,4,5,6,7,8,9,10,11,12
T52n	R36w	1,12
T54n	R33w	4,5,6,7,8,9,16,17,18,19,20,21,28
T54n	R34w	1,2,3,4,5,6,7,8,9,10,11,12,13,14,15,16,17,18,19,20,21,22, 23,24,28,29,30,31,32,33
T54n	R35w	1,2,3,4,5,8,9,10,11,12,13,14,15,16,17,
T55n	R34w	31
T55n	R35w	32,33,34,35,36

DATE OF ISSUE February 21 1997
month day year

DATE EFFECTIVE April 21 1997
month day year

ISSUED BY: Charles B. Hernandez Director, Pricing & Regulatory Affairs
Missouri Gas Energy
Kansas City, MO. 64111

Missouri Gas Energy,
a Division of Southern Union Company

For: All Missouri Service Areas

INDEX OF CERTIFICATED AREAS

TOWNSHIP RANGE SECTIONS

RAY COUNTY

T52n	R29w	3,4,5,6,7,8,9,10
T53n	R29w	5,6,7,18,19,30,31,32,33,34
T54n	R29w	31,32

SALINE COUNTY

T48n	R23w	2,3,6,7,10,11,12,14,15,
T50n	R21w	2,3,4,9,10,16
T50n	R23w	11,12,13,14,19,30
T51n	R20w	1,2,3,10,11,12,14,15,16,19,20,21,22,27,28,29,30
T51n	R21w	24,25,26,33,34,35,36

STONE COUNTY

T25n	R24w	3,4,5,8,9
T26n	R24w	4,5,8,9,16,17,20,21,28,29,32,33,34

VERNON COUNTY

T34n	R31w	13,14,23,24,25,26,27,34,35,36
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DATE OF ISSUE February 21 1997
month day year

DATE EFFECTIVE April 21 1997
month day year

ISSUED BY: Charles B. Hernandez

Director, Pricing & Regulatory Affairs
Missouri Gas Energy
Kansas City, MO. 64111



MISSOURI GAS ENERGY

3420 Broadway, • Kansas City, MO • 64111-2404 • (816) 360-5755

ROBERT J. HACK
SENIOR ATTORNEY

RECEIVED

APR 17 1997

MISSOURI
Public Service Commission

April 11, 1997

Mr. Mack McDuffey
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Tariff File No. 9700571

Dear Mack:

Per your request, attached is a list of orders that MGE used in preparing the above-referenced tariff filing. Please call if you have questions.

Sincerely,

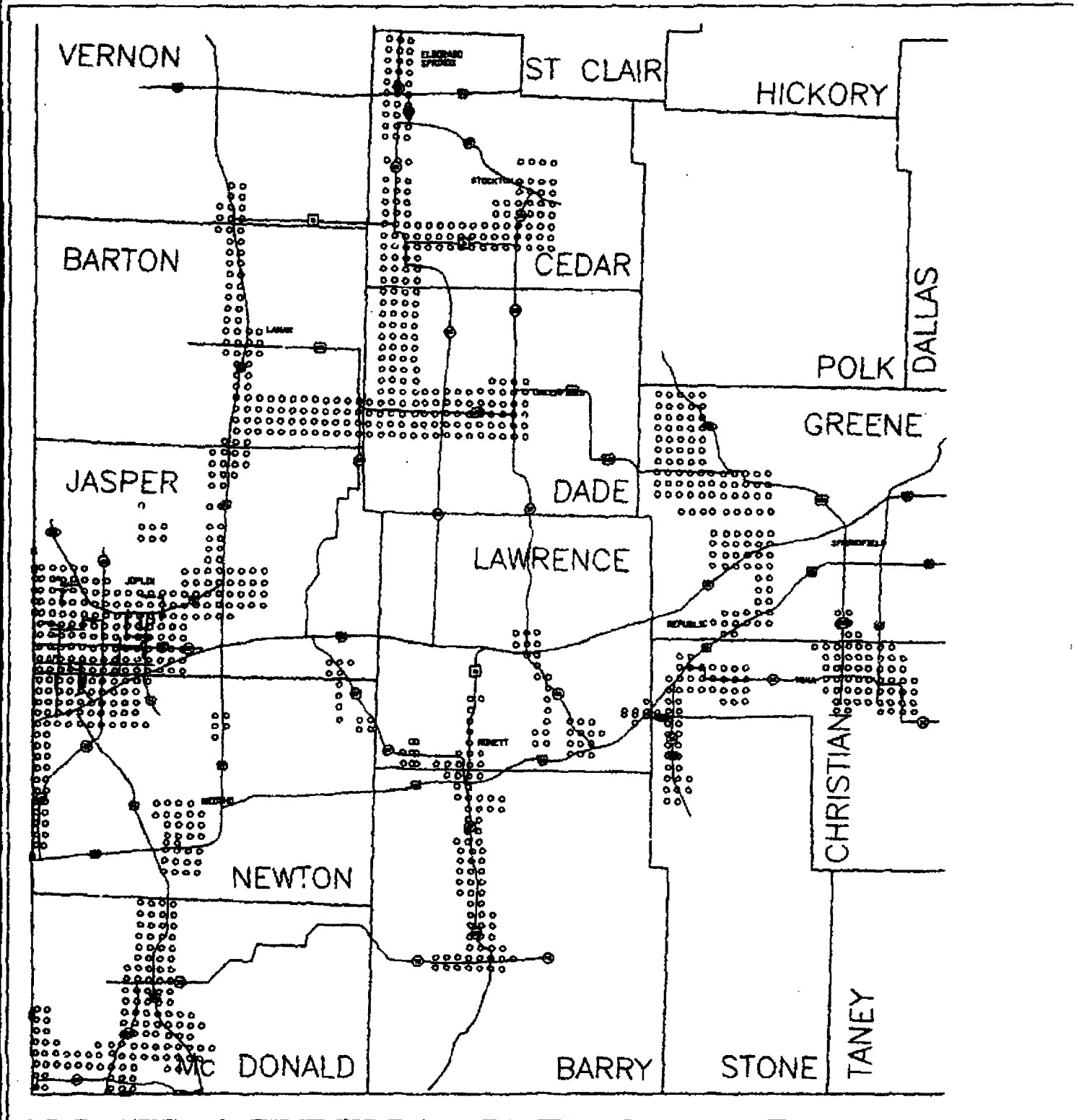
CC: Charley Hernandez

Date of Order	Case No.	Company
November 22, 1935	9,059 9,060 9,065	Gas Service, Cities Service & Kansas City Gas
November 21, 1935	9,274	Gas Service
January 20, 1941	9,962	Gas Service
July 10, 1947	11,058	Gas Service, Interstate Gas Co.
March 24, 1950	11,874	Gas Service
June 4, 1954	11,928	Gas Service, Platte County Gas & Missouri Valley Gas & Oil
December 15, 1950	12,066	Gas Service
December 14, 1951	12,284	Central West Utility Company
July 14, 1954 (& Supp. Orders)	12,354 12,415 12,419	Central West Utility Co. & Gas Service
May 24, 1955	12,632/12,674	Gas Service/Missouri Public Service
July 21, 1955	13,159	Gas Service
June 15, 1956	13,356	Gas Service
April 23, 1957	13,614	Gas Service
April 23, 1957	13,644	Gas Service
October 14, 1957	13,794	Gas Service
May 26, 1958	13,882	Gas Service Purchase of Missouri Power & Light
June 12, 1958	13,943	Gas Service
December 20, 1958	14,070	Gas Service
December 22, 1958	14,543	Gas Service
December 22, 1958	14,544	Gas Service
November 10, 1960	14,545	Gas Service
May 5, 1961	14,676	Gas Service
July 13, 1961	14,723	Gas Service
July 13, 1961	14,724	Gas Service
March 8, 1962	14,866	Gas Service
March 8, 1962	14,882	Gas Service
May 17, 1962	14,933	Gas Service
May 24, 1962	14,941	Gas Service
October 30, 1962	15,093 (Suppl Orders 10/1/62)	Gas Service
November 1, 1962	15,107	Gas Service
October 30, 1962	15,117	Gas Service
March 22, 1963	15,177	Gas Service
March 25, 1963	15,178	Gas Service
April 19, 1963	15,217	Gas Service
June 15, 1963	15,239	Gas Service
June 13, 1963	15,250	Gas Service
June 13, 1963	15,251	Gas Service
June 13, 1963	15,252	Gas Service
June 13, 1963	15,253	Gas Service
July 10, 1964	15,520	Gas Service Purchase Carl Junction Gas
November 10, 1960	15,545	Gas Service
December 14, 1964	15,630	Gas Service
September 21, 1965	15,803	Gas Service

Date of Order	Case No.	Company
May 11, 1966	Amended Order	Gas Service
July 13, 1967	Supp. Order	Gas Service
March 29, 1966	15,937	Gas Service
March 30, 1966	15,938	Gas Service
March 30, 1966	15,944	Gas Service
May 20, 1966	15,987	Gas Service
August 23, 1968	15,994	Gas Service
December 15, 1966	16,111	Gas Service
January 20, 1967	16,127	Gas Service
April 14, 1967	16,146	Gas Service
April 14, 1967	16,147	Gas Service
April 14, 1967	16,148	Gas Service
April 14, 1967	16,172	Gas Service
April 14, 1967	16,178	Gas Service
April 14, 1967	16,180	Gas Service
September 22, 1967	16,190	Gas Service
September 22, 1967	16,191	Gas Service
September 22, 1967	16,192	Gas Service
September 22, 1967	16,194	Gas Service
September 22, 1967	16,204	Gas Service
September 22, 1967	16,205	Gas Service
September 22, 1967	16,217	Gas Service
September 22, 1967	16,218	Gas Service
September 22, 1967	16,219	Gas Service
October 1, 1968	16,327	Gas Service
May 21, 1968	16,472	Gas Service
September 5, 1968	16,495	Gas Service
July 29, 1968	16,552	Gas Service
May 5, 1971	17,101	Gas Service
June 29, 1972	17,480	Gas Service
May 15, 1986	GA-86-109	Kansas Power & Light
February 6, 1987	GA-87-28	Kansas Power & Light
May 6, 1988	GA-88-160	Kansas Power & Light
April 18, 1995	GA-95-189	Missouri Gas Energy

This is a detailed map of the central region of Missouri, showing county boundaries and names. The map includes counties such as Andrew, De Kalb, Buchanan, Platte, Clay, Clinton, Caldwell, Davison, Livingston, Carroll, Chariton, Randolph, Linn, Macon, Howard, Saline, Lafayette, Johnson, Pettis, Benton, Morgan, Cass, Bates, and Henry. Major cities like St. Louis, St. Charles, and St. Joseph are marked with dots. The map is oriented with North at the top.

MGE SOUTHERN SYSTEM



the transportation customers for whom the EGM equipment is necessary. The Commission finds in favor of MGE and Staff on this issue.

U. Shipper Trading

The Commission fails to discern any proposed benefit to MGE or its gas users by implementation of a shipper trading proposal similar to that stated in the Hearing Memorandum.

Implementation of the proposal would violate the burner-tip balancing agreement between Williams Natural Gas Company (WNG) and MGE. Furthermore, as demonstrated by MGE witness Gillmore, implementation of this proposal would result in system control being transferred from MGE to a group of shippers. The system control must remain in the hands of MGE. (Ex. 32, p. 31.) Approval of Mountain Iron's shipper trading idea would be, in all probability, an abdication by the Commission of its duty to ensure safe and adequate service by gas corporations. Section 393.130.1, R.S.Mo. (1994). Finally, the Commission sees no competent and substantial evidence in the record to support the shipper trading idea.

For all these reasons, the Commission will not order implementation of the shipper trading idea.

VIII. Certificated Areas

MGE has committed to file tariff sheets with metes and bounds descriptions and maps showing certificated service areas in the State of Missouri by February 28, 1997. (Tr. 1738-1739). This commitment by MGE adequately addressed Staff's concern on this issue. (Staff Initial Brief, p. 183).

The Commission finds that this issue is resolved by virtue of MGE's commitment to file the requested tariff sheets by February 28, 1996.