

Missouri Gas Energy  
Business Segment Information for  
Southern Union Company for the Fiscal Years 1993, 1994 and 2005

Business Segments	Segment SIC Codes	Fiscal Year Ended: December 2005						Fiscal Year Ended: June 1994					
		Segment Sales (\$ mill)	% Of Total	Segment Oper Inc. (\$ mill)	% Of Total	Segment Depr (\$ mill)	% Of Total	Segment Cap Exp (\$ mill)	% Of Total	Segment Assets (\$ mill)	% Of Total	% Of Total	
Distribution Transportation and Storage Corporate & Other	4924	4922											
	4924	\$ 1,503.272	74 %	\$ (43.928)	(19) %	\$ 63.278	50 %	\$ 84.896	31 %	\$ 2,490.164	43 %		
	4922	\$ 505.233	25	\$ 281.344	124	\$ 62.171	49	\$ 189.415	68	\$ 3,155.549	54		
	4911	\$ 10.925	1	\$ (10.699)	(5)	\$ 0.944	1	\$ 2.306	1	\$ 191.106	3		
Natural Gas Utility	4924	4922											
	4924	\$ 374.500	100 %	\$ 32.000	100 %	\$ 21.900	100 %	\$ 38.200	100 %	\$ 891.000	100 %		
Natural Gas Utility	4924	4922											
	4924	\$ 209.000	100 %	\$ 19.800	100 %	\$ 14.400	100 %	\$ 18.500	100 %	\$ 416.200	100 %		

Source of Information: Standard & Poor's Compustat Services, Inc., PC Plus / Research Insight Data Base

## RESEARCH

## Research Update:

**Southern Union And Unit Downgraded To 'BBB-', Off Watch Neg**Publication date:  
Primary Credit Analyst:29-Nov-2006  
Plana Lee, New York (1) 212-438-3119;  
plana\_lee@standardandpoors.com**Rationale**

On Nov. 29, 2006, Standard & Poor's Ratings Services lowered its corporate credit ratings on Southern Union Co. and subsidiary Panhandle Eastern Pipe Line L.P. to 'BBB-' from 'BBB'. At the same time, Standard & Poor's removed the ratings from CreditWatch with negative implications.

The outlook is stable. The rating was originally placed on CreditWatch on Sept. 15, 2006.

The rating action reflects our assessment of the company's movement toward riskier business segments, coupled with an aggressive financial policy that liberally uses debt leverage. Together, these traits embody credit quality at the lower end of the 'BBB' category.

Houston, Texas-based Southern Union engages in natural gas transportation, storage, liquefied natural gas (LNG) terminaling, gathering and processing, and distribution.

The ratings are based on a business risk profile at the consolidated entity that is categorized as satisfactory and an aggressive financial risk profile. Southern Union's credit strengths include the cash flow stability of its regulated interstate natural gas pipeline assets, a hedging program designed to mitigate the commodity price exposure of its Southern Union Gas Services gathering and processing segment (SUGS), and its remaining low-risk gas distribution businesses in Missouri and Massachusetts.

Southern Union's pipeline assets (about 51% of total expected 2007 EBITDA) include wholly owned Panhandle Eastern Pipe Line and its subsidiaries (collectively Panhandle Energy), which transport gas from the Gulf Coast and Anadarko basin to the Midwest and Great Lakes markets. Subsequent to the closing of the currently pending transaction with Energy Transfer Partners, Southern Union will also have a 50% ownership interest in Florida Gas Transmission Co. The pipeline segments bring stability to cash flows due to generally favorable FERC regulation, access to multiple supply points, strong markets, and manageable re-contracting risk.

These strengths are partially offset by the weak business risk profile of the gathering and processing segment at SUGS (23% of total EBITDA). Southern Union's acquisition of SUGS for \$1.6 billion in March 2006 increased its business and financial risk. SUGS' percent-of-proceeds contracts account for about 80% of its margins and expose the company to volatile commodity prices. Moreover, the purchase price was initially financed entirely with debt, which was later repaid with proceeds from \$1.1 billion in utility asset sales and \$600 million in junior subordinated debt.

SUGS' commodity price risk is somewhat mitigated through 2007 by a hedging program consisting of natural gas puts with an \$11 floor for 2006 on 45,000 million Btu (mmBtu) per day (about 85% of equity volumes) and a \$10 floor for 2007 on 25,000 mmBtu per day (about 50% of equity volumes). Furthermore, the company has added ethane, propane, and crude oil puts with an average \$12.04 floor on 8,000 mmBtu per day for the remainder of 2006 and an average \$11.40 floor on 26,000 mmBtu per day for 2007, resulting in an effective hedge position of about 90% for both years. SUGS also has a strong market-share position in the Texas and New Mexico region, where it has operated for more than 60 years.

At Southern Union's Trunkline LNG facility (12% of total EBITDA), capital costs are high and are expected to reach about \$250 million for the LNG infrastructure enhancement project (IEP), which will add ambient air vaporization and natural gas liquids extraction capabilities to the terminal. IEP is fully contracted with BG Group under long-term contracts and should add

an estimated \$35 million in EBIT upon completion in 2008.

Following the sale of the Rhode Island and Pennsylvania utilities, Missouri Gas Energy (MGE) and New England Gas Co, (together 14% of total EBITDA) are Southern Union's remaining low-risk gas-distribution businesses. MGE makes up the bulk of this segment, and its strong business risk profile reflects reasonably favorable regulation by the Missouri Public Service Commission, a mostly residential customer base, the ability to recover fuel costs from customers as they are incurred, a franchise with Kansas City, Mo. that extends through 2010, and a perpetual franchise with St. Joseph, Mo.

Given Southern Union's movement away from natural gas utilities and toward the midstream industry, cash flows have become less predictable and, as a result, stronger credit-protection measures are expected to maintain ratings. However, at the same time, the company's credit protection measures have been stretched and its financial policy has been aggressive, with hybrid securities, preferred stock and convertible debt combined making up about 17% of the capital structure.

Southern Union's expected credit protection metrics at year-end 2006, including trailing twelve-month funds from operations to fully adjusted total debt of about 9%, adjusted total debt to EBITDA of about 5x, and adjusted total debt to capital of about 60%, are weak for the 'BBB-' rating. The ratings incorporate the expected equity issuance of \$100 million in 2008 for the convertible notes issued in 2005, and the additional debt incurred as part of the pending transaction with Energy Transfer Partners. Going forward, the company will be required to guard its balance sheet and be less reliant on debt leverage to maintain the current ratings.

As part of the rating action, the rating on the company's \$600 million junior subordinated notes was lowered to 'BB' from 'BB+'. The 'BB' rating is two notches below the corporate credit rating. The notching reflects Southern Union's investment grade corporate credit rating, the subordination of the hybrid issue, and the optional deferral of interest payments. The hybrid securities have a maturity of 60 years, are callable after five years, and have received intermediate (50%) equity credit for leverage purposes.

### Liquidity

Southern Union's liquidity is adequate. The company's primary liquidity source is cash flow from operations, which was \$328 million for the nine months ended Sept. 30, 2006, and cash on hand was \$6.9 million as of that date. The company also has access to a \$400 million revolving credit facility maturing in May 2010, of which \$195 million was outstanding as of Sept 30, 2006. Consolidated Southern Union's long-term debt maturities over the next several years are manageable at \$455 million in 2007, \$525 million in 2008, and \$60 million in 2009.

### Outlook

The stable outlook reflects the higher risk of Southern Union's midstream business, somewhat offset by the stability afforded by its utility and pipeline transport segments. The stable outlook also incorporates expectations that the company will continue to mitigate commodity price exposure through active hedging beyond 2007. Rating improvement is possible if Southern Union mitigates its increased business risk through investments in lower-risk businesses, combined with a strengthening of its consolidated financial profile. Conversely, further downward rating movement could occur if the company continues to acquire higher-risk businesses that are financed by selling lower-risk assets and incurring additional debt.

### Ratings List

Downgraded, Off Watch Neg

	To	From
Southern Union Co.		
Corporate Credit Rating	BBB-/Stable/--	BBB/Watch Neg/--
Senior Unsecured	BBB-	BBB/Watch Neg
Junior Subordinated	BB	BB+/Watch Neg
Preferred Stock	BB	BB+/Watch Neg

Panhandle Eastern Pipe Line LP

Corporate Credit Rating	BBB-/Stable/--	BBB/Watch Neg/--
Senior Unsecured	BBB-	BBB/Watch Neg

Complete ratings information is available to subscribers of RatingsDirect, the real-time Web-based source for Standard & Poor's credit ratings, research, and risk analysis, at [www.ratingsdirect.com](http://www.ratingsdirect.com). All ratings affected by this rating action can be found on Standard & Poor's public Web site at [www.standardandpoors.com](http://www.standardandpoors.com); under Credit Ratings in the left navigation bar, select Find a Rating, then Credit Ratings Search.

Analytic services provided by Standard & Poor's Ratings Services (Ratings Services) are the result of separate activities designed to preserve the independence and objectivity of ratings opinions. The credit ratings and observations contained herein are solely statements of opinion and not statements of fact or recommendations to purchase, hold, or sell any securities or make any other investment decisions. Accordingly, any user of the information contained herein should not rely on any credit rating or other opinion contained herein in making any investment decision. Ratings are based on information received by Ratings Services. Other divisions of Standard & Poor's may have information that is not available to Ratings Services. Standard & Poor's has established policies and procedures to maintain the confidentiality of non-public information received during the ratings process.

Ratings Services receives compensation for its ratings. Such compensation is normally paid either by the issuers of such securities or third parties participating in marketing the securities. While Standard & Poor's reserves the right to disseminate the rating, it receives no payment for doing so, except for subscriptions to its publications. Additional information about our ratings fees is available at [www.standardandpoors.com/usratingsfees](http://www.standardandpoors.com/usratingsfees).

Missouri Gas Energy  
Market-to-Book Ratios, Earnings / Book Ratios and  
Inflation for Standard & Poor's Industrial Index and  
the Standard & Poor's 500 Composite Index  
from 1947 through 2005

Year	Market-to-Book Ratio (1)		Earnings/Book Ratio (2)		Inflation (4)	Earnings / Book Ratio - Net of Inflation	
	S&P Industrial Index (3)	S&P 500 Composite Index (3)	S&P Industrial Index (3)	S&P 500 Composite Index (3)			
1947	1.23 %	NA	13.0 %	NA	9.0 %	4.0 %	NA
1948	1.13	NA	17.3	NA	2.7	14.6	NA
1949	1.00	NA	16.3	NA	(1.8)	18.1	NA
1950	1.16	NA	18.3	NA	5.8	12.5	NA
1951	1.27	NA	14.4	NA	5.9	8.5	NA
1952	1.29	NA	12.7	NA	0.9	11.8	NA
1953	1.21	NA	12.7	NA	0.6	12.1	NA
1954	1.45	NA	13.5	NA	(0.5)	14.0	NA
1955	1.81	NA	16.0	NA	0.4	15.6	NA
1956	1.92	NA	13.7	NA	2.9	10.8	NA
1957	1.71	NA	12.5	NA	3.0	9.5	NA
1958	1.70	NA	9.8	NA	1.8	8.0	NA
1959	1.94	NA	11.2	NA	1.5	9.7	NA
1960	1.82	NA	10.3	NA	1.5	8.8	NA
1961	2.01	NA	9.8	NA	0.7	9.1	NA
1962	1.83	NA	10.9	NA	1.2	9.7	NA
1963	1.94	NA	11.4	NA	1.7	9.7	NA
1964	2.18	NA	12.3	NA	1.2	11.1	NA
1965	2.21	NA	13.2	NA	1.9	11.3	NA
1966	2.00	NA	13.2	NA	3.4	9.8	NA
1967	2.05	NA	12.1	NA	3.0	9.1	NA
1968	2.17	NA	12.6	NA	4.7	7.9	NA
1969	2.10	NA	12.1	NA	6.1	6.0	NA
1970	1.71	NA	10.4	NA	5.5	4.9	NA
1971	1.99	NA	11.2	NA	3.4	7.8	NA
1972	2.16	NA	12.0	NA	3.4	8.6	NA
1973	1.96	NA	14.6	NA	8.8	5.8	NA
1974	1.39	NA	14.8	NA	12.2	2.6	NA
1975	1.34	NA	12.3	NA	7.0	5.3	NA
1976	1.51	NA	14.5	NA	4.8	9.7	NA
1977	1.38	NA	14.6	NA	6.8	7.8	NA
1978	1.25	NA	15.3	NA	9.0	6.3	NA
1979	1.23	NA	17.2	NA	13.3	3.9	NA
1980	1.31	NA	15.6	NA	12.4	3.2	NA
1981	1.24	NA	14.9	NA	8.9	6.0	NA
1982	1.17	NA	11.3	NA	3.9	7.4	NA
1983	1.45	NA	12.2	NA	3.8	8.4	NA
1984	1.46	NA	14.6	NA	4.0	10.6	NA
1985	1.67	NA	12.2	NA	3.8	8.4	NA
1986	2.02	NA	11.5	NA	1.1	10.4	NA
1987	2.50	NA	15.7	NA	4.4	11.3	NA
1988	2.13	NA	19.0	NA	4.4	14.6	NA
1989	2.56	NA	18.5	NA	4.7	13.8	NA
1990	2.63	NA	16.3	NA	6.1	10.2	NA
1991	2.77	NA	10.8	NA	3.1	7.7	NA
1992	3.29	NA	13.0	NA	2.9	10.1	NA
1993	3.72	NA	15.7	NA	2.8	12.9	NA
1994	3.73	NA	23.0	NA	2.7	20.3	NA
1995	4.06	2.64	22.9	16.0 %	2.5	20.4	13.5 %
1996	4.79	2.99	24.8	16.8	3.3	21.5	13.5
1997	5.88	3.53	24.6	16.3	1.7	22.9	14.6
1998	7.13	4.16	21.3	14.5	1.6	19.7	12.9
1999	8.27	4.76	25.2	16.7	2.7	22.5	14.0
2000	7.51	4.51	23.9	15.6	3.4	20.5	12.2
2001	NA	3.50	NA	15.0	1.6	NA	13.4
2002	NA	2.93	NA	8.3	2.4	NA	5.9
2003	NA	2.78	NA	14.1	1.9	NA	12.2
2004	NA	3.12 (5)	NA	16.1	3.3	NA	12.8
2005	NA	3.35 (5)	NA	19.9	3.4	NA	16.5
Average	2.34 %	3.48 %	14.9 %	15.4 %	3.9 %	10.9 %	12.9 %

- Notes: (1) Market-to-Book Ratio equals average of the high and low market price for the year divided by the average book value.  
(2) Earnings/Book equals earnings per share for the year divided by the average book value.  
(3) On January 2, 2001 Standard & Poor's released Global Industry Classification Standard (GICS) price indexes for all Standard & Poor's U.S. Indexes. As a result, all S&P Indexes have been calculated with a common base of 100 at a start date of December 31, 1994. Also, the GICS Industrial sector is not comparable to the former S&P Industrial Index and data for the former S&P Industrial Index has been discontinued.  
(4) As measured by the Consumer Price Index (CPI).  
(5) Ratios for 2004 are based upon estimated book values using the actual average price and the estimated book value calculated by adding the 2004 or 2005 earnings per share to the 2003 and 2004 book value per share and then subtracting the 2004 and 2005 dividends per share as provided by Standard & Poor's Security Price Index Record, 2006 Edition. Pp. 471 and 473 and 2005.

Source of Information: Standard & Poor's Security Price Index Record, 2000 Edition, p. 40  
Standard & Poor's Statistical Service, Current Statistics, August 2001, p. 29  
Standard & Poor's Statistical Service, Current Statistics, January 2001, p. 36  
Standard & Poor's Current Statistics, June 2006, p. 29  
Standard & Poor's Security Price Index Record, 2006 Edition, pp. 1, 471 and 473  
Standard & Poor's Compustat Services, Inc. PC Plus Research Insight Data Base  
Ibbotson Associates, Stocks, Bonds, Bills and Inflation - Valuation Edition 2006 Yearbook, 2006

Missouri Gas Energy  
Exchanges on Which the Common Shares of the Proxy Companies Relied  
upon by Mr. Hanley and Mr. Murray and Southern Union Co. are Traded

<u>Proxy Group of Four Gas Distribution Companies</u>	<u>Stock Exchange</u>
Cascade Natural Gas Corporation	NYSE
NICOR Inc.	NYSE
Northwest Natural Gas Company	NYSE
Piedmont Natural Gas Co., Inc.	NYSE
 <u>Proxy Group of Eight Value Line Gas Distribution Companies</u>	
Cascade Natural Gas Corporation	NYSE
The Laclede Group, Inc.	NYSE
New Jersey Resources Corp.	NYSE
NICOR Inc.	NYSE
Northwest Natural Gas Company	NYSE
Peoples Energy Corporation	NYSE
Piedmont Natural Gas Co., Inc.	NYSE
WGL Holdings, Inc.	NYSE
 Southern Union Company	NYSE
 <u>Witness Murray's Proxy Group of Six Comparable Natural Gas Distribution Companies for Missouri Gas Energy</u>	
AGL Resources Inc.	NYSE
New Jersey Resources Corp.	NYSE
Northwest Natural Gas Company	NYSE
Piedmont Natural Gas Co., Inc.	NYSE
South Jersey Industries, Inc.	NYSE
WGL Holdings, Inc.	NYSE
 <u>Two Natural Gas Distribution Companies Identified by Witness Murray as Having Operations in Missouri</u>	
Atmos Energy Corporation	NYSE
The Laclede Group, Inc.	NYSE

Source of Information: AUS Utility Reports  
December 2006

Stocks, Bonds, Bills,  
and Inflation

**SBBI**

**Valuation Edition**  
2006 Yearbook



Table 7-14

**Size Effect within Industries**

Summary Statistics and Excess Returns

(Through Year-end 2005)

SIC Code	Description	Years	Large Company Group		
			Geometric Mean	Arithmetic Mean	Standard Deviation
10	Metal Mining	80	7.87%	11.47%	29.09%
13	Oil and Gas Extraction	43	11.41%	14.34%	26.13%
15	Building Construction-General Contractors & Op Builders	34	12.93%	19.66%	39.85%
16	Hvy Construction Other than Bldg Construction-Contractors	35	7.28%	10.93%	30.54%
20	Food and Kindred Spirits	80	10.88%	12.52%	18.98%
22	Textile Mill Products	80	7.00%	11.87%	32.64%
23	Apparel & other Finished Products Made from Fabrics & Similar	46	8.01%	12.64%	32.81%
24	Lumber and Wood Products, Except Furniture	43	9.62%	12.26%	25.37%
25	Furniture and Fixtures	36	10.11%	12.46%	22.37%
26	Paper & Allied Products	76	10.29%	13.68%	28.09%
27	Printing, Publishing and Allied Products	47	10.71%	12.81%	21.05%
28	Chemicals and Allied Products	80	11.78%	13.91%	22.45%
29	Petroleum Refining & Related Industries	80	11.40%	13.50%	21.34%
30	Rubber & Miscellaneous Plastics Products	59	10.83%	13.54%	25.34%
31	Leather & Leather Products	43	12.74%	17.08%	33.02%
32	Stone, Clay, Glass & Concrete Products	77	8.66%	12.46%	31.50%
33	Primary Metal Industries	80	8.08%	12.01%	30.39%
34	Fabricated Metal Products, Except Machinery & Trans. Equip.	80	9.56%	12.08%	23.10%
35	Industrial & Commercial Machinery & Computer Equipment	80	10.68%	14.09%	27.66%
36	Electrical Equipment & Components, Except Computer	80	9.86%	13.58%	28.54%
37	Transportation Equipment	80	10.82%	15.07%	32.08%
38	Measuring, Analyzing & Controlling Instruments	69	12.04%	14.14%	21.96%
39	Miscellaneous Manufacturing Industries	44	7.88%	11.74%	28.57%
40	Railroad Transportation	80	9.65%	12.67%	24.86%
42	Motor Freight Transportation & Warehousing	42	9.78%	13.24%	28.28%
45	Transport by Air	60	7.26%	11.67%	32.37%
48	Communications	43	8.89%	11.20%	22.08%
49	Electric, Gas & Sanitary Services	80	8.78%	10.89%	21.48%
50	Wholesale Trade-Durable Goods	60	10.12%	12.34%	22.64%
51	Wholesale Trade-Nondurable Goods	38	9.94%	12.89%	24.91%
53	General Merchandise Stores	80	9.88%	13.09%	26.56%
54	Food Stores	49	11.29%	13.79%	23.37%
56	Apparel & Accessory Stores	59	14.08%	18.18%	32.15%
57	Home Furniture, Furnishings, and Equipment Stores	33	12.37%	23.69%	60.37%
58	Eating and Drinking Places	37	10.85%	15.36%	33.13%
59	Miscellaneous Retail	43	12.66%	15.93%	26.94%
60	Depository Institutions	37	11.64%	13.78%	21.37%
61	Nondepository Credit Institutions	56	12.83%	15.66%	26.45%
62	Security and Commod. Brokers, Dealers, Exchanges	33	17.78%	24.55%	43.10%
63	Insurance Carriers	37	10.63%	12.51%	20.39%
64	Insurance Agents, Brokers, and Service	33	14.79%	16.25%	18.21%
65	Real Estate	43	7.34%	11.82%	30.63%
67	Holding & Other Investment Offices	76	10.00%	13.17%	25.21%
70	Hotels, Rooming Houses, Camps, & Other Lodging	36	10.03%	15.69%	35.13%
72	Personal Services	36	8.73%	13.40%	30.78%
73	Business Services	43	10.20%	15.01%	32.56%
78	Motion Pictures	55	12.11%	16.67%	33.13%
79	Amusement and Recreation Services	33	12.44%	16.16%	27.50%
80	Health Services	34	13.17%	18.92%	35.76%

Source: Center for Research in Security Prices, University of Chicago.



Firm Size and Return

Table 7-14 (continued)

**Size Effect within Industries**

Summary Statistics and Excess Returns

(Through Year-end 2005)

SIC Code	Description	Small Company Group			Excess Return
		Geometric Mean	Arithmetic Mean	Standard Deviation	
10	Metal Mining	8.31%	16.30%	46.05%	4.83%
13	Oil and Gas Extraction	12.81%	21.07%	46.60%	6.73%
15	Building Construction-General Contractors & Op Builders	6.64%	15.87%	43.37%	-3.79%
16	Hvy. Construction Other than Bldg. Construction-Contractors	18.58%	23.57%	37.33%	12.65%
20	Food and Kindred Spirits	12.36%	15.95%	30.16%	3.44%
22	Textile Mill Products	9.77%	15.35%	34.60%	3.49%
23	Apparel & other Finished Products Made from Fabrics & Similar	5.72%	11.52%	37.95%	-1.12%
24	Lumber and Wood Products, Except Furniture	11.02%	21.19%	53.51%	8.93%
25	Furniture and Fixtures	9.12%	13.29%	29.62%	0.83%
26	Paper & Allied Products	14.21%	19.79%	42.06%	6.12%
27	Printing, Publishing and Allied Products	16.30%	19.15%	24.91%	6.34%
28	Chemicals and Allied Products	13.38%	18.87%	39.59%	4.95%
29	Petroleum Refining & Related Industries	13.21%	17.68%	31.92%	4.18%
30	Rubber & Miscellaneous Plastics Products	12.60%	17.05%	32.93%	3.52%
31	Leather & Leather Products	11.75%	16.79%	34.22%	-0.29%
32	Stone, Clay, Glass & Concrete Products	9.71%	14.54%	33.16%	2.08%
33	Primary Metal Industries	13.01%	18.76%	38.48%	6.75%
34	Fabricated Metal Products, Except Machinery & Trans. Equip.	11.77%	17.41%	37.42%	5.33%
35	Industrial & Commercial Machinery & Computer Equipment	12.20%	17.59%	35.60%	3.50%
36	Electrical Equipment & Components, Except Computer	12.01%	20.02%	45.90%	6.44%
37	Transportation Equipment	12.04%	18.32%	38.31%	3.25%
38	Measuring, Analyzing & Controlling Instruments	13.25%	18.19%	35.01%	4.05%
39	Miscellaneous Manufacturing Industries	8.07%	12.55%	31.90%	0.82%
40	Railroad Transportation	8.46%	14.82%	36.36%	2.15%
42	Motor Freight Transportation & Warehousing	7.21%	13.19%	38.93%	-0.04%
45	Transport by Air	8.71%	17.13%	48.27%	5.46%
48	Communications	17.30%	25.50%	46.18%	14.30%
49	Electric, Gas & Sanitary Services	10.34%	13.96%	29.63%	3.08%
50	Wholesale Trade-Durable Goods	11.01%	16.26%	36.38%	3.92%
51	Wholesale Trade-Nondurable Goods	8.64%	12.33%	28.69%	-0.56%
53	General Merchandise Stores	9.37%	16.84%	43.14%	3.75%
54	Food Stores	10.00%	13.82%	29.54%	0.03%
56	Apparel & Accessory Stores	11.87%	18.02%	38.93%	-0.16%
57	Home Furniture, Furnishings, and Equipment Stores	15.82%	26.33%	51.19%	2.64%
58	Eating and Drinking Places	2.03%	7.97%	36.84%	-7.39%
59	Miscellaneous Retail	12.11%	17.66%	36.52%	1.74%
60	Depository Institutions	15.33%	17.99%	25.10%	4.21%
61	Nondepository Credit Institutions	13.52%	17.44%	29.94%	1.78%
62	Security and Commod. Brokers, Dealers, Exchanges	14.58%	21.59%	42.10%	-2.96%
63	Insurance Carriers	13.39%	16.25%	24.02%	3.74%
64	Insurance Agents, Brokers, and Service	11.82%	19.26%	43.80%	3.01%
65	Real Estate	6.72%	11.65%	34.85%	-0.16%
67	Holding & Other Investment Offices	11.19%	15.46%	31.25%	2.28%
70	Hotels, Rooming Houses, Camps, & Other Lodging	6.42%	12.53%	37.23%	-3.16%
72	Personal Services	18.06%	22.49%	32.80%	9.09%
73	Business Services	13.95%	23.68%	59.91%	8.67%
78	Motion Pictures	6.18%	14.05%	45.60%	-2.62%
79	Amusement and Recreation Services	11.18%	15.10%	31.68%	-1.07%
80	Health Services	15.59%	22.05%	40.75%	3.13%

Source: Center for Research in Security Prices, University of Chicago

Missouri Gas Energy  
Decoupling Mechanisms, Conservation Adjustments and other Revenue Normalization Adjustment Clauses  
for Mr. Hanley's Proxy Group of Four Gas Distribution Companies (1),  
the Proxy Group of Eight Value Line Gas Distribution Companies (2)  
and Southern Union Company  
and Witness Murray's Proxy Group of Six Comparable Natural Gas Distribution Companies (3)  
and Two Natural Gas Distribution Companies Identified by Witness Murray as Having Operations in Missouri (4)

Decoupling Mechanisms,  
Conservation and Other  
Revenue Normalization  
Adjustment Clauses

Companies

AGL Resources, Inc. (3)	Yes (5)
Atmos Energy Corporation (4)	No
Cascade Natural Gas Corporation (1, 2)	No (6)
The Laclede Group, Inc. (2, 4)	No
New Jersey Resources Corp. (2, 3)	Yes (7)
NICOR Inc. (1, 2)	No
Northwest Natural Gas Company (1, 2, 3)	Yes (8)
Peoples Energy Corporation (2)	No
Piedmont Natural Gas Co., Inc. (1, 2, 3)	Yes (9)
South Jersey Industries, Inc. (3)	Yes (7)
WGL Holdings, Inc. (2, 3)	Yes (10)
<u>Southern Union Company</u>	No

- Notes: (1) The companies in Mr. Hanley's proxy group of four LDCs are Cascade, NICOR Inc., Natural Gas Corporation, Northwest Natural Gas Company and Piedmont Natural Gas Company.
- (2) The companies in Mr. Hanley's proxy group of eight Value Line LDCs are Cascade, The Laclede Group, Inc., New Jersey Resources Corp., NICOR Inc., Northwest Natural Gas Company, Peoples Energy Corporation, Piedmont Natural Gas Company and WGL Holdings, Inc.
- (3) The companies in Witness Murray's Proxy Group of Six Comparable Natural Gas Distribution Companies are AGL Resources Inc. New Jersey Resources Corp., Northwest Natural Gas Company, Piedmont Natural Gas Company, South Jersey Industries, Inc. and WGL Holdings, Inc.
- (4) The Two companies identified by Witness Murray as having operations in Missouri are Atmos Energy Corporation and The Laclede Group, Inc.
- (5) Straight-Fixed-Variable Rates Atlanta Gas Light's revenue is recognized under a straight-fixed-variable rate design whereby Atlanta Gas Light charges rates to its customers based primarily on monthly fixed charges. This mechanism minimizes the seasonality of revenues since the fixed charge is not volumetric and the monthly charges are not set to be directly weather dependent. Weather indirectly influences the number of customers that have active accounts during the heating season, and this has a seasonal impact on Atlanta Gas Light's revenues since generally more customers are connected in periods of colder weather than in periods of warmer weather.
- (6) On October 10, 2006, Cascade Natural Gas, the Washington Utilities and Transportation Commission Staff, the Public Counsel section of the Washington Attorney General's Office, and others reached a settlement in Cascade's pending gas rate case proceeding (Docket No. UG-060256). The settlement does not specify traditional rate case parameters such as rate of return, but calls for CGC to implement a partial decoupling mechanism on a pilot basis for a three-year period. The mechanism would defer non weather-related margin variances (e.g., changes in usage related to conservation and energy efficiency improvements). The Commission has not approved the Mechanism yet. A WUTC decision is expected in January 2007.
- (7) On October 12, 2006, the New Jersey Board of Public Utilities (BPU) approved a three-year pilot energy conservation programs and revenue decoupling mechanisms that had been proposed by New Jersey Natural Gas (NJNG) and South Jersey Gas (SJG). Under the programs, NJNG and SJG will implement enhanced customer education and energy conservation programs. In place of the existing weather normalization clauses, the companies will implement a conservation and usage adjustment (CUA) mechanism that is designed to remove the impact on company earnings and revenue of sales fluctuations due to weather variations and customer participation in the conservation programs. The CUA mechanism is to be implemented during the October 2006 billing cycle, with the first adjustment under the mechanism to become effective in October 2007. NJNG is a subsidiary of New Jersey Resources (NJR), and SJG is a subsidiary of South Jersey Industries (SJI).
- (8) Northwest Natural Gas Company has a conservation tariff in the state of Oregon, which includes two components. The first component is a price elasticity adjustment, which adjusts for anticipated increases or decreases in consumption attributable to annual changes in commodity costs or periodic changes in its general rates. The second component is a conservation adjustment calculated on a monthly basis to account for deviations between actual and expected volumes (decoupling adjustment). Additional or credits to customers resulting from the decoupling adjustment are recorded to a deferral account, which is included in the next year's annual PGA. Baseline consumption was determined by customer consumption data used in the 2003 Oregon general rate case, adjusted for added consumption resulting from new customers. The Adjustment Clause was scheduled to expire in September 2005, but in 2005 was renewed by the Oregon Commission. The Commission approved the continuation of the conservation tariff for an additional four years, through September 30, 2009, and increased the mechanism's coverage from a partial decoupling of 90 percent of residential and commercial gas usage to a full decoupling of 100 percent.
- (9) Piedmont Natural Gas Company has WNA Clauses in place in the states of South Carolina and Tennessee. Furthermore, up to September 2006, the company had a WNA Clause in the state of North Carolina. However, on September 14, 2006, the North Carolina Utilities Commission (NCUC) adopted a settlement reached by the Company and the North Carolina Attorney General on July 18, 2006, regarding the company's Customer Utilization Tracker (CUT). The CUT is a mechanism that decouples the recovery of authorized margins from sales levels. The CUT applies to changes in sales levels caused by any factor. The CUT was originally approved on November 3, 2005 as an experimental provision for three-years, which automatically will terminate on November 1, 2008, unless renewed by the NCUC and with the modifications approved on September 14, 2006, the NCUC concurrently eliminated the existing Weather Normalization Adjustment Clause.
- (10) In August 2005, Washington Gas received approval from the Public Service Commission of Maryland to implement a Revenue Normalization Adjustment mechanism (RNA). The RNA is a billing adjustment mechanism that is designed to stabilize the level of distribution charge revenues received from Maryland customers as a result of deviations in customer usage caused by variations in weather from normal levels and other matters such as conservation.