

**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 Variance from Certain)
Commission Rules in Order to Provide)
Electronic Billing.)

Case No. GE-2008-0352
Tariff No. JG-2008-0645

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (Commission) and for its Recommendation, states as follows:

1. On April 29, 2008, the Commission issued its *Order Directing Filing* directing the Staff to file a recommendation regarding the application of Missouri Gas Energy (MGE). MGE seeks a variance from Commission rules that would allow it to offer MGE customers the option of receiving and paying bills electronically.

2. The Staff has reviewed each of the tariff sheets filed in this case and has determined MGE's requested program to be reasonable and similar to the electronic billing programs now in use by Laclede Gas Company and Kansas City Power and Light Company. For the reasons stated in Staff's Memorandum, attached hereto as Appendix A and incorporated by reference, Staff recommends the Commission approve the set of tariff sheets filed on April 28, 2008 and supplemented on May 12, 2008, with a May 28, 2008 effective date.

WHEREFORE, the Staff recommends the Commission approve the tariff sheets filed by MGE to become effective on and after May 28, 2008.

Respectfully submitted,

/s/ **Robert S. Berlin**

Robert S. Berlin
Senior Counsel
Missouri Bar No. 51709

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record 14th day of May, 2008.

/s/ **Robert S. Berlin**

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
Case No. GE-2008-0352, File No. JG-2008-0645 Missouri Gas Energy

FROM: Tom Imhoff, Energy Department - Tariffs/Rate Design

<u>/s/ Tom Imhoff 05/13/08</u> Energy Department/Date	<u>/s/ Robert S. Berlin 05/13/08</u> General Counsel's Office/Date
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SUBJECT: Staff Recommendation On Missouri Gas Energy's Tariff Sheets Filed to begin a program that would allow Missouri Gas Energy customers the option to receive and pay their gas bills electronically and allow a variance from Commission Rules.

DATE: May 13, 2008

On April 28, 2008, Missouri Gas Energy (MGE), a division of Southern Union Company, filed tariff sheets with the Missouri Public Service Commission (Commission) with a proposed effective date of May 28, 2008. In addition, MGE filed an Application For Variance (Variance) from Commission Rules 4 CSR 240-13.015(1)(B), 4 CSR 240-13.015(1)(T), 4 CSR 240-13.050(5) and 4 CSR 240-13.055(3). On April 29, 2008, the Commission issued an ORDER DIRECTING FILING that directed the Staff to file its recommendation by May 14, 2008.

MGE seeks a Variance that would allow MGE to offer a program that would allow its customers the option to receive and pay bills electronically. After the Commission's Energy Department - Tariffs/Rate Design Staff (Staff) investigation and review of this filing, it was noted that MGE had deleted the term "first-class mail" on Tariff Sheets R-23 and R-25. Staff requested MGE file supplemental tariff sheets to re-insert the "first-class mail" term. On May 12, 2008, MGE filed supplemental tariff sheets and complied with Staff's request.

The Staff has reviewed each of the tariff sheets, as filed by MGE on April 28, 2008 and as supplemented on May 12, 2008, along with MGE's Variance request from Commission Rules 4 CSR 240-13.015(1)(B), 4 CSR 240-13.015(1)(T), 4 CSR 240-13.050(5) and 4 CSR 240-13.055(3). Staff has determined MGE's requested program is reasonable and is similar to the electronic billing programs now in use by Laclede Gas Company (Case No. GE-2002-1159) and Kansas City Power and Light Company (Case No. EE-2003-0529). Therefore, Staff recommends that the set of tariff sheets filed on April 28, 2008 and supplemented on May 12, 2008, be approved and to become effective on and after May 28, 2008.

P.S.C. MO. No. 1

Second Revised SHEET No. R-7, Canceling First Revised SHEET No. R-7
Second Revised SHEET No. R-8, Canceling First Revised SHEET No. R-8
Second Revised SHEET No. R-9, Canceling First Revised SHEET No. R-9
Second Revised SHEET No. R-10, Canceling First Revised SHEET No. R-10
Fifth Revised SHEET No. R-23, Canceling Fourth Revised SHEET No. R-23
Second Revised SHEET No. R-25, Canceling First Revised SHEET No. R-25
Second Revised SHEET No. R-27, Canceling First Revised SHEET No. R-27
Second Revised SHEET No. R-51, Canceling First Revised SHEET No. R-51
Second Revised SHEET No. R-52, Canceling First Revised SHEET No. R-52

The Staff has verified that MGE has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

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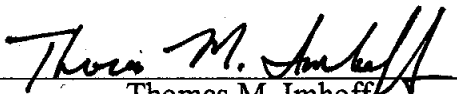
In the Matter of the Application of)
Missouri Gas Energy, a Division of)
Southern Union Company, for a)
Variance from Certain Commission)
Rules in Order to Provide Electronic)
Billing)

Case No. GE-2008-0352

AFFIDAVIT OF THOMAS M. IMHOFF

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Thomas M. Imhoff, of lawful age, on oath states: that he participated in the preparation of the foregoing Staff Recommendation in memorandum form, to be presented in the above case; that the information in the Staff Recommendation was provided to him; that he has knowledge of the matters set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief.



Thomas M. Imhoff

Subscribed and sworn to before me this 13th day of May, 2008.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086



Notary Public