BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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

Case No. GR-2006-0422

STAFF'S MOTION TO CORRECT SURREBUTTAL TESTIMONY OF ANNE ALLEE

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and respectfully submits as follows:

1. On December 13, 2006, Staff filed the Surrebuttal Testimony of Anne Allee. Attached to Ms. Allee's testimony was Schedule AMA 1. Attached hereto and incorporated by reference is Corrected Schedule AMA 1. The Corrected Schedule AMA 1 correctly corresponds to Ms. Allee's Surrebuttal, p. 2, lines 13-18, wherein she describes a redlined version of her Schedule AMA 1. The corrected Scheduled AMA 1 provides the inadvertently omitted redlining.

2. No Party will be prejudiced by the filing of Corrected Schedule AMA 1 and the Corrected Schedule 1 cannot be substituted in any printed copies.

WHEREFORE Staff respectfully requests that the Commission issue an Order allowing Staff to correct the Surrebuttal Testimony of Anne Allee by filing Corrected Schedule AMA 1.

Respectfully submitted,

/s/ Robert V. Franson

Robert V. Franson Senior Counsel Missouri Bar No. 34643

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 29th day of December 2006.

/s/ Robert V. Franson

Concurrently with the Company's annual Actual Cost Adjustment (ACA) filing the Company shall:

- Provide all-documentation to support the Company's ACA to reconcile the Company's actual gas costs with its billed revenues. Provide all documentation of the natural gas purchases (commodity, demand or reservation charges or other charges) of the LDC to support that the claimed costs are properly attributed to the ACA period and that the pipelines, natural gas suppliers, and any other vendors have charged or invoiced the LDC for the volumes nominated and received at the proper rates.
- Provide all-documentation to support the prudence of the Company's natural gas supply planning, capacity planning, purchasing practices, and operating decisions for the ACA period.
- Provide all-documentation of the financial impact on customers of the LDC's use of its gas supply, transportation and storage contracts.
- Provide a copy of all contracts in effect at any time during the ACA period. Include copies of all contracts related to the procurement of natural gas including but not limited to transportation, storage, and supply contracts and all schedules and exhibits and letter agreements related to gas procurement, gas costs and/or gas constraints.

The documentation provided shall include fully functioning electronic versions.

The term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed electronic or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to the LDC and its employees, contractors, agents or others employed by or acting in its behalf.