Exhibit No.: _____
Issue(s): Financial Analysis of Company
Witness/Type of Exhibit: Burdette/Supplemental Rebuttal
Sponsoring Party: Public Counsel
Case No.: GM-2001-585

# SUPPLEMENTAL REBUTTAL TESTIMONY

# OF

# MARK BURDETTE



Submitted on Behalf of
the Office of the Public Counsel

**GATEWAY PIPELINE COMPANY, INC.,**
**MISSOURI GAS COMPANY AND**
**MISSOURI PIPELINE COMPANY**
**Case No. GM-2001-585**

August 13, 2001

NP

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

| | | |
|---|---|---|
| In the Matter of the Joint Application of Gateway Pipeline Company, Inc., Missouri Gas Company and Missouri Pipeline Company. | ) ) ) ) | Case No. GM-2001-585 |

**AFFIDAVIT OF MARK BURDETTE**

STATE OF MISSOURI )
) ss
COUNTY OF COLE )

Mark Burdette, of lawful age and being first duly sworn, deposes and states:

1. My name is Mark Burdette. I am a Financial Analyst for the Office of the Public Counsel.

2. Attached hereto and made a part hereof for all purposes is my supplemental rebuttal testimony consisting of pages 1 through 4.

3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Mark Burdette
Mark Burdette

Subscribed and sworn to me this 13th day of August 2001.

Bonnie S. Howard
Notary Public

My commission expires May 3, 2005.

BONNIE S. HOWARD NOTARY SEAL MY COMMISSION EXPIRES MAY 03, 2005 COUNTY OF MONITEAU NOTARY PUBLIC STATE OF MISSOURI

**SUPPLEMENTAL REBUTTAL TESTIMONY**

**OF**

**MARK BURDETTE**

**GATEWAY PIPELINE COMPANY, INC.**

**CASE NO. GM-2001-585**

## INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. Mark Burdette, P.O. Box 7800, Ste. 650, Jefferson City, Missouri 65102-7800.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by the Office of the Public Counsel of the State of Missouri (OPC or Public Counsel) as a Public Utility Financial Analyst.

Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION IN THIS PROCEEDING?

A. Yes. I filed Rebuttal testimony.

Q. WHAT IS THE PURPOSE OF THIS SUPPLEMENTAL REBUTTAL TESTIMONY?

A. I will make additional comments on the proposed acquisition by Gateway Pipeline Company, Inc. (Gateway) from UtiliCorp United Inc. (UtiliCorp, UCU), all outstanding shares of UtiliCorp Pipeline Systems, Inc. (UPL), the unregulated parent company of Missouri Gas Company (MGC) and Missouri Pipeline Company (MPC).

Q. DO YOU BELIEVE THE MISSOURI PUBLIC SERVICE COMMISSION SHOULD GRANT APPROVAL OF THE PROPOSED TRANSACTION?

A. No.

Q. WHY DO YOU BELIEVE THE MPSC SHOULD DENY THE PROPOSED TRANSACTION?

A. I do not think the companies have provided sufficient evidence or support to establish that this transaction is financially sound and will not be detrimental to the public interest.

Q. HAVE COMPANY RESPONSES TO DATA REQUESTS PROVIDED THE DETAILED AND COMPLETE INFORMATION NECESSARY FOR YOUR ANALYSIS?

A. No. As I said in my rebuttal testimony, the information provided has been insufficient to allow for a complete analysis. For example, below is the question asked in Public Counsel data request RO13, and an excerpt from the company response:

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Unfortunately, ** _____ ** is not sufficient, ** _____ **, to alleviate fears of detriment. ** _____
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_____ **

Q. HAS THE COMPANY PROVIDED ADDITIONAL INFORMATION ON ISSUES WHERE THE PREVIOUSLY PROVIDED INFORMATION WAS LACKING OR INCOMPLETE?

A. Yes, some data request responses have been updated.

Q. DO THESE UPDATES ALLEVIATE PUBLIC COUNSEL'S CONCERNS?

A. No. _____

_____

_____ **

In fact, the updated response provides an area of additional concern.

Q. WHAT IS THE AREA OF ADDITIONAL CONCERN?

A. * _____

_____

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[redacted] ** Beyond that, the MPSC is facing a murky picture of Gateway and this proposed transaction.

Q. DOES THIS COMPLETE YOUR TESTIMONY?

A. Yes.