

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

In the Matter of Missouri Gas Energy, Inc.'s)
Filing of Revised Tariffs to Increase its Annual)
Revenues for Natural Gas) **Case No. GR-2014-0007**

STAFF STATEMENT DESCRIBING DISCOVERY CONCERN

COMES NOW the Staff (Staff) of the Missouri Public Service Commission (Commission), by and through counsel, and respectfully submits the following statement of discovery concerns pursuant to Section 5(B) of the Procedural Schedule:

1. On November 13, 2013, the Commission issued its *Order Adopting Recommended Procedural Schedule*, which adopted the *Recommendation of The Parties Regarding Procedural Schedule* and set a Discovery Conference for January 8, 2014.

2. Paragraph 5(B) of the *Procedural Schedule* provides:

Not less than two (2) business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved.

3. Staff's discovery concern involves data requests submitted by Staff to MGE and relates to documents supporting MGE's merger savings, as well as documents supporting the following MGE expense items: property taxes, wages and salaries, rate case expense and corporate allocations.

4. **WHEREFORE**, Staff submits this statement and requests a discovery conference be held January 8, 2014, pursuant to Paragraph 5 of the *Recommendation of the Parties Regarding Procedural Schedule*.

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/ John D. Borgmeyer

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 6th day of January, 2014.

/s/ John D. Borgmeyer