

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

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

**PUBLIC COUNSEL'S MOTION TO
ESTABLISH NOTICE AND LOCAL PUBLIC HEARINGS**

COMES NOW the Office of the Public Counsel and for its Motion to Establish Notice and Local Public Hearings states:

1. In the Commission's July 14, 2006 *Order Regarding Procedural Schedule, Test Year and True-Up Hearing*, the Commission directed the parties to file a pleading suggesting the locations of the Local Public Hearings and proposed language to constitute notice of such hearings no later than July 25, 2006.

2. Public Counsel concurs with the notice recommended by the Staff with a few exceptions. First, Public Counsel proposes that the Commission direct interested consumers to first seek information regarding comments from the Commission or Public Counsel as follows:

If you wish to comment or secure additional information, you may contact the Missouri Public Service Commission by telephone at (800) 392-4211, by e-mail at pscinfo@psc.mo.gov, or by mail at P.O. Box 360, Jefferson City, Missouri 65102. Your State sponsored consumer advocate, the Office of the Public Counsel, can be reached by telephone at (573) 751-4857, by email at mopco@ded.mo.gov, or by mail at P.O. Box 2230, Jefferson City, Missouri 65102. You may also contact MGE at (816)-360-5980, or by e-mailing us at MGE_rates@sug.com. Hearings will be held in a building that meets accessibility standards required by the Americans with Disabilities Act. Any person needing additional accommodations to participate in these hearings may call the Public Service Commission's hotline at 1-800-392-4211 (Customer Services Hotline) or 1-800-829-7541 (TDD hotline) prior to the meeting.

Second, Public Counsel also recommends that the Commission modify the notice proposed by the Staff to correct the inaccurate “March 2006” effective date of the rates.

3. Public Counsel disagrees with the public hearing schedule proposed in the Staff’s motion. Public Counsel recommends that the Commission add three (3) additional public hearings to Staff’s proposal. Public Counsel recognizes that only four (4) public hearings were deemed appropriate in the last MGE rate case. Regardless, Public Counsel believes that it is in the public interest to allow all MGE customers a better opportunity to testify regarding MGE’s requested rate increase.

4. If public hearings are held only in the cities of Blue Springs, Joplin, Kansas City, and St. Joseph, certain customers could be deterred from testifying due to the long distances they would be required to travel. For example, MGE has customers in the City of Fayette in Howard County. The nearest public hearing for a Fayette customer of MGE would be in Blue Springs, one-hundred (100) miles away. Likewise, MGE customers in the communities of El Dorado Springs (Cedar County) and Ozark (Christian County) would need to drive eighty-two (82) miles and eighty-five (85) miles respectively to attend a public hearing. The schedule proposed above attempts to allow any MGE customer to attend a public hearing with a travel distance of less than fifty (50) miles with the addition of three public hearings in Marshall, Republic and Stockton.

WHEREFORE, Public Counsel respectfully moves to adopt the notice proposed by the Staff as amended by Public Counsel, and to adopt Public Counsel’s recommendation to schedule seven (7) local public hearings in the cities of Blue Springs, Joplin, Kansas City, Marshall, Republic, St. Joseph and Stockton.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 25th day of July 2006:

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