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December 7, 1994

DAVID L. RAUCH
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Director, Utility Operations

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Director, Policy & Planning

KENNETH J. RADEMAN
Director, Utility Services

DANIEL S. ROSS
Director, Administration

CECIL I. WRIGHT
Chief Hearing Examiner

ROBERT J. HACK
General Counsel

Mr. David L. Rauch
Executive Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GO-91-277 -- In the matter of the review and approval of a cast iron main and unprotected steel main program for Western Resources, Inc. d/b/a Gas Service.

Dear Mr. Rauch:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of **STAFF'S RESPONSE TO ORDER CONCERNING MOTION TO MODIFY AND MGE'S RESPONSE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

William M. Shansey
Assistant General Counsel
314-751-8702

WMS:rsn

Enclosure

cc: Counsel of Record

FILED
DEC 8 1994
MISSOURI
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the review)
and approval of a cast iron)
main and unprotected steel)
main program for Western)
Resources, Inc. d/b/a Gas)
Service.)

Case No. GO-91-277

FILED

DEC 8 1994

STAFF'S RESPONSE TO ORDER
CONCERNING MOTION TO MODIFY AND MGE'S RESPONSE

MISSOURI
PUBLIC SERVICE COMMISSION

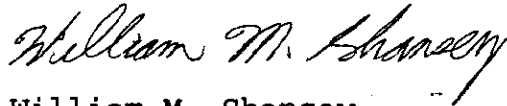
COMES NOW the Staff of the Public Service Commission of the State of Missouri ("Staff") and for its response to the Commission's Order Concerning Motion to Modify of December 2, 1994 and the subsequent response of Missouri Gas Energy ("MGE"), a division of Southern Union Company ("Southern Union") respectfully states as follows:

1. The Staff first wishes to assure the Commission that there has been no "abandonment" of the prioritization schedule for replacement of cast iron and unprotected steel mains by MGE. The Staff, in its recommendation, agreed to the reprioritization of categories proposed by MGE based on MGE's experience in the actual replacement of mains since the inception of the original plan. The Staff's agreement with this reprioritization of categories was based on its monitoring of both Western Resources, Inc. d/b/a Gas Service's replacement program and MGE's continued work on that program over the years of its operation. In addition, the Staff participated in detailed meetings with MGE's technical staff regarding their reasons for changing the categories and proposed ideas for those changes.

2. This monitoring and those detailed discussions did not easily lend themselves to condensation into a brief memorandum format. This, coupled with the Staff's desire to meet MGE's request expediently, produced a recommendation which lacked the level of detail desired by the Commission.

3. The Staff has reviewed a draft of MGE's response to the December 2 order and concurs in MGE's averments. The Staff is willing and ready to participate in an on the record conference to answer the Commission's questions or to submit whatever additional documentation the Commission may deem appropriate.

Respectfully submitted,

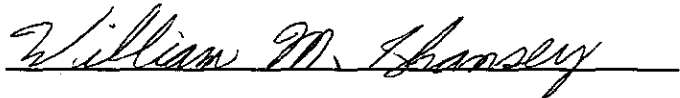


William M. Shansey
Assistant General Counsel

Attorney for the Staff of the
Missouri Public Service Commission
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(314) 751-8702

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 7th day of December, 1994.



Service List for Case No. GO-91-277

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