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October 31, 2002

Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GR-2001-382 et al.

FILED<sup>3</sup>
OCT 3 1 2002

Missouri Public Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of the Missouri Gas Energy's Proposed Procedural Schedule. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON SWEARENGEN & ENGLAND P.C.

By:

Dean L. Cooper

DLC/tli Enclosures

CC:

Thomas R. Schwarz, Jr. Douglas E. Micheel

James B. Deutsch Jeffrey A. Keevil

**FILED**<sup>3</sup>

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI Service Commission

n the Matter of Missouri Gas Energy's Purchased Gas Adjustment Tariff Revisions to be Reviewed In its 2000-2001 Actual Cost Adjustment.	) ) )	Case No. GR-2001-382
In the Matter of Missouri Gas Energy's Purchased Gas Cost Adjustment Factors to be Reviewed in its 1999-2000 Actual Cost Adjustment.	) )	Case No. GR-2000-425
In the Matter of Missouri Gas Energy's Purchased Gas Cost Adjustment Factors to be Reviewed in its 1998-1999 Actual Cost Adjustment.	) )	Case No. GR-99-304
In the Matter of Missouri Gas Energy's Purchased Gas Cost Adjustment Tariff Revisions to be Reviewed in its 1997-1998 Actual Cost Adjustment.	) ) )	Case No. GR-98-167

# PROPOSED PROCEDURAL SCHEDULE

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union
Company, and, in response to the Missouri Public Service Commission's

("Commission") Order Directing Parties to File a Proposed Procedural Schedule,
respectfully states as follows:

1. On October 17, 2002, the Commission issued its Order Directing the Parties to File a Proposed Procedural Schedule. This Order, among other things, directed that the parties file, no later than October 31, 2002, a proposed procedural schedule that leads to an initial hearing on the issues concerning Staff's proposed adjustment based on imputing income to MGE for the release of capacity on the Kansas Pipeline, and its proposed disallowance based on MGE's purchasing practices related to hedging and use of storage capacity, as well as the issue relating to Staff's

request for a Peak Day Requirements Study.

2. In response to the Commission Order and after consultation with the other parties to this matter, MGE proposes the following Procedural Schedule<sup>1</sup>:

January 15, 2003 Direct Testimony (all parties wishing to file)

March 18, 2003 Rebuttal Testimony (all parties wishing to file)

April 22, 2002 Surrebuttal testimony (all parties wishing to file)

April 29, 2003 Issues List to be filed

May 2, 2003 Position Statements (all parties)

May 12-16, 2003 Hearing

3. Counsel for the Commission Staff; the Office of the Public Counsel; the City of Joplin; and, Riverside Pipeline Company, L.P., Mid-Kansas Partnership and Kansas Pipeline Company, have stated that they have no objection to the schedule proposed above.

WHEREFORE, MGE respectfully requests that the Commission issue its Order adopting the above procedural schedule leading to an initial hearing on the issues concerning Staff's proposed adjustment based on imputing income to MGE for the release of capacity on the Kansas Pipeline, and its proposed disallowance based on MGE's purchasing practices related to hedging and use of storage capacity, as well as the issue relating to Staff's request for a Peak Day Requirements Study.

This procedural schedule is proposed with the knowledge that MGE may seek to complete certain discovery prior to the filing of direct testimony. At this time, it appears that Staff members necessary to complete such discovery will be available sufficiently prior to the filing of direct testimony in order to complete this process. However, if this circumstance changes, MGE may seek modification of this schedule.

Respectfully submitted,

Dean L. Cooper

MBE #36592

Gary W. Duffy

MBE #24905

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## Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered, or sent U.S. Mail, postage prepaid, on this 3/5 day of October, 2002, to:

Mr. Thomas R. Schwarz, Jr. Missouri Public Service Commission Governor State Office Building P.O. Box 360 Jefferson City, MO 65102-0360

Mr. James B. Deutsch Blitz, Bardgett & Deutsch, L.C. 308 East High Street, Suite 301 Jefferson City, Missouri 65101 Mr. Douglas Micheel The Office of the Public Counsel 6<sup>th</sup> Floor, Governor State Office Building P.O. Box 7800 Jefferson City, MO 65102-7800

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