

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

**FILED<sup>2</sup>**  
MAY 07 2003  
Missouri Public  
Service Commission

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

**CITY OF JOPLIN'S STATEMENT OF POSITION**

**COMES NOW** the City of Joplin, Missouri ("Joplin") and for its Statement of Position states as follows:

**1. MGE is entitled to recover in rates all prudently incurred gas costs. MGE owns long-term capacity on Kansas Pipeline Company, to meet customer demands but did not use it in the summer months of the 2000/2001 ACA period. Was MGE's decision not to post the KPC capacity for release, or alternatively, release equivalent Williams capacity within the range of prudent behavior; and, if not, is \$858,158 an appropriate measure of economic harm?**

Joplin supports Staff on this issue.

**2. MGE is entitled to recover all prudently incurred gas costs. Staff maintains that MGE should have hedged at a minimum 30% of each winter month's normal volumes; MGE maintains there was no hedging standard in place prior to the winter of 2000/2001 but, regardless, hedged 38% of normal winter volumes. Was MGE's hedging conduct within the range of prudent behavior for the winter of 2000/2001; if not, is \$614,365 an appropriate measure of economic harm?**

Joplin supports Staff on this issue.

**3. MGE is entitled to recover in rates all prudently incurred gas costs. MGE**

**utilizes natural gas from first-of-month contract purchases, intra-month contract purchases and storage to meet its customers' heating season requirements. Was MGE prudent in its management of first-of-month and intra-month contract purchases and use of storage withdrawals; and, if not, is \$8,051,049 an appropriate measure of economic harm?**

Joplin supports staff on this issue.

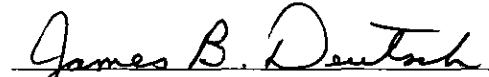
**4. In July 2000, MGE filed an annual "Reliability Report" pursuant to a Commission order in a prior case. Staff reviewed the peak day and reliability information and the rationale for the reserve margin and has recommended in this case that the Commission order MGE to provide additional reliability information. Is this case an appropriate forum in which to consider the issue, and, if so, should the Commission order MGE to provide the requested reliability information?**

Joplin supports Staff on this issue.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:



James B. Deutsch, #27093

508 East High Street

Suite 301

Jefferson City, MO 65101

Telephone No.: (573) 634-2500

Facsimile No.: (573) 634-3358

E-mail: [jdeutsch@blitzbardgett.com](mailto:jdeutsch@blitzbardgett.com)

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent U.S. Mail, postage prepaid, to the following parties of record on this 7<sup>th</sup> day of May, 2003.

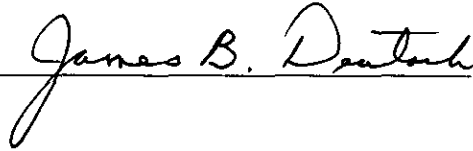
Thomas R. Schwarz, Jr.  
Deputy General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Douglas E. Michael  
Office of Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 7800  
Jefferson City, MO 65102

Gary W. Duffy  
Brydon, Swearingen & England, P.C.  
P.O. Box 456  
Jefferson City, MO 65102

Jeffrey A. Keevil  
Stewart & Keevil Law Offices  
1001 Cherry Street, Suite 302  
Columbia, MO 65201

Robert Hack  
Missouri Gas Energy  
3420 Broadway  
Kansas City, MO 64111

  
\_\_\_\_\_