MEMORANDUM

TO: Missouri Public Service Commission Official Case File,

Case No. GR-2009-0161, File No. YG-2009-0304, Missouri Gas Utility

FROM: James A. Gray, Energy Department – Tariffs/Rate Design

/s/ Thomas M. Imhoff 11/4/08 /s/ Lera L.Shemwell 11/4/08
Energy Department/Date General Counsel's Office/Date

SUBJECT: Staff Recommendation on Missouri Gas Utility's Scheduled Winter Season PGA

Filing - Effective November 12, 2008

DATE: November 4, 2008

On October 29, 2008, Missouri Gas Utility (MGU or Company) of Littleton, Colorado filed a tariff sheet requesting an effective date of November 12, 2008. The tariff sheet was filed to reflect a change in MGU's Purchased Gas Adjustment (PGA) factors as the result of estimated changes in the cost of natural gas for the upcoming winter season and changes in the Actual Cost Adjustment (ACA) factor. The winter season includes the months of November through March.

For the MGU system (serving communities such as Hamilton and Gallatin), the effects of these changes increase the PGA rate factor, effective on April 15, 2008, from \$0.7039 per hundred cubic feet (Ccf) to \$0.8816 per Ccf. The PGA rate for the 2007-2008 winter season was \$0.7291 per Ccf. Based on average winter usage, a Residential customer's bill is expected to be approximately \$99 higher than last year, or an approximate 14% increase.

Case No. GR-2009-0161, under which these changes were filed, was established to track the Company's PGA factors to be reviewed in its 2007-2008 ACA filing. Case No. GR-2008-0136 was established to track the Company's PGA factors to be reviewed in its 2006-2007 ACA filing. This rate change should be on an interim, subject to refund status should be maintained pending final Commission decisions in ACA Case Nos. GR-2009-0161 and GR-2008-0136.

Due to the limited time available to review the documentation supporting the ACA factor represented in this filing, the Procurement Analysis Department (PAD) has requested permission to submit its results and recommendations regarding the information included in this ACA filing to the Commission on or before December 31, 2009.

Staff has verified that this company has filed its annual report and is not delinquent on any assessment. Staff is not aware of any other matter before the Commission that affects or is affected by this filing.

MO PSC CASE NO. GR-2009-0161 OFFICIAL CASE FILE MEMORANDUM PAGE 2 of 2

Staff has reviewed this filing and has determined that it was calculated in conformance with MGU's PGA Clause. Staff is of the opinion that good cause for approval of this tariff sheet on less than thirty (30) days notice is demonstrated by MGU's Commission-approved PGA clause allowing for ten (10) business days notice for PGA change filings. Therefore, Staff recommends that the following tariff sheet be approved, interim subject to refund:

P.S.C. MO. No.1	
Fifth Revised Sheet No. 51	Cancels Fourth Revised Sheet No. 51

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Utility, Inc.'s Purchased Gas Adjustment (PGA) Factors to be audited in its 2007-2008 Actual Cost Adjustment.) -))	Case No. GR-2009-0161
AFFIDAVIT OF JAMES A. GRAY		
STATE OF MISSOURI)) ss COUNTY OF COLE)		
COUNTY OF COLE)		
James A. Gray, of lawful age, on or preparation of the foregoing Staff Recompresented in the above case; that the information by him; that he has knowledge of the matter and that such matters are true to the best of his	mendation in the Starts set forth in	in memorandum form, to be aff Recommendation was given n such Staff Recommendation;
	ga	Mes a Gray James A. Gray
Subscribed and sworn to before me this	day of Nove	mber, 2008.

SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086

Notary Public