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September 11, 2002

Mr. Dale Hardy Roberts  
Executive Secretary  
Public Service Commission  
Governor State Office Building  
Jefferson City, MO

**FILED<sup>3</sup>**  
SEP 11 2002

**RE:** Case No. GT-2003-0033  
Missouri Gas Energy

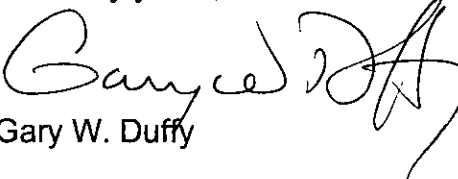
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of MGE's Position Statement.

If you have any questions, please give me a call.

Sincerely yours,

  
Gary W. Duffy

Enclosures  
cc w/encl:

Doug Micheel, Office of Public Counsel  
Robert Franson, Office of the General Counsel  
Richard Brownlee  
Mike Noack

FILED<sup>3</sup>

SEP 11 2002

Missouri Public  
Service Commission

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

In the Matter of the Tariff Filing of Missouri  
Gas Energy, a division of Southern Union  
Company. )

) Case No. GT-2003-0033  
) Tariff No. JG-2003-0049

**POSITION STATEMENT OF MGE**

COMES NOW Missouri Gas Energy, a division of Southern Union Company  
(MGE), and for its position statement in this proceeding, respectfully states as follows:

A. Do the tariffs filed by MGE provide for the aggregate purchasing of natural gas supplies and pipeline transportation service on behalf of eligible school entities in accordance with aggregate purchasing contracts negotiated by and through a not-for-profit school association as required by Section 393.310.4(1) RSMo Supp. 2002?

**MGE's Position:** Yes, and so do the tariffs which are attached to the Stipulation and Agreement.

B. Do the tariffs filed by MGE provide for the resale of such natural gas supplies, including related transportation service costs, to the eligible school entities at the gas corporation's cost of purchasing of such gas supplies and transportation, plus all applicable distribution costs, plus an aggregation and balancing fee to be determined by the Commission, not to exceed four-tenths of one cent per therm delivered during the first year as required by Section 393.310.4(2) RSMo Supp. 2002?

**MGE's Position:** Yes, and so do the tariffs which are attached to the Stipulation

and Agreement.

C. Do the tariffs not require telemetry or special metering, except for individual school meters over one hundred thousand therms annually as required by Section 393.310.4(3) RSMo Supp. 2002?

**MGE's Position:** Yes, and so do the tariffs which are attached to the Stipulation and Agreement.

D. Is there sufficient evidence for the Commission to find that implementation of the aggregation program set forth in the MGE tariffs will not have any negative financial impact on MGE as required by Section 393.310.5 RSMo Supp. 2002?

**MGE's Position:** With the admission of the pre-filed testimony pursuant to the Stipulation and Agreement, the answer is yes.

E. Is there sufficient evidence for the Commission to find that implementation of the aggregation program set forth in the MGE tariffs will not have any negative financial impact on MGE's other customers as required by Section 393.310.5 RSMo Supp. 2002?

**MGE's Position:** With the admission of the pre-filed testimony pursuant to the Stipulation and Agreement, the answer is yes.

F. Is there sufficient evidence for the Commission to find that implementation of the aggregation program set forth in the MGE tariffs will not have any negative financial impact on local taxing authorities as required by Section 393.310.5 RSMo Supp. 2002?

**MGE's Position:** With the admission of the pre-filed testimony pursuant to the Stipulation and Agreement, the answer is yes.

G. Is there sufficient evidence for the Commission to find that the aggregation

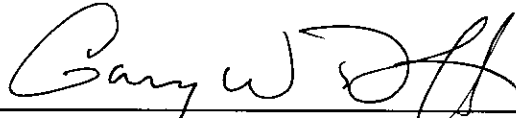
charge is sufficient to generate revenue at least equal to all incremental costs caused by the experimental aggregation program as required by 393.310.5 RSMo Supp. 2002?

**MGE's Position:** With the admission of the pre-filed testimony pursuant to the Stipulation and Agreement, the answer is yes.

H. How should MGE release its firm interstate pipeline transportation capacity to participants of the Program?

**MGE's Position:** It should be released in the manner provided for in the tariffs recommended by the Stipulation and Agreement.

Respectfully submitted,



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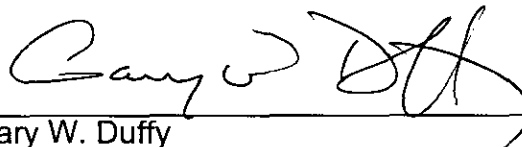
**Certificate of Service**

I hereby certify that a true and correct copy of the above and foregoing document was hand-delivered, on this 11<sup>th</sup> day of September, 2002, to:

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Missouri Public Service Commission  
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Gary W. Duffy

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