



MISSOURI GAS ENERGY

3420 Broadway • Kansas City, MO • 64111-2404 • (816) 360-5755

ROBERT J. HACK

Vice President, Pricing & Regulatory Affairs

May 14, 2004

RECEIVED²

MAY 17 2004

*Records
Public Service Commission*

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, Missouri 65102-0360

FILED³

MAY 17 2004

*Missouri Public
Service Commission*

**Re: Case Nos. GM-2000-43, GM-2000-500, GM-2000-502, GM-2000-503 and
GM-2003-0238, Missouri Gas Energy**

Dear Mr. Roberts:

Pursuant to the Commission orders in the above-referenced cases, enclosed for filing herein are one (1) original and eight (8) conformed copies of this letter and a report containing customer service performance information for calendar year 2003.

If you have any questions regarding the enclosed information, please feel free to give me a call.

Sincerely,

C: Carl Ricketts
Ron Crow
Paul Boudreau
Doug Micheel
Cliff Snodgrass

Enclosures

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MAY 18 2004

UTILITY SERVICES DIV.
PUBLIC SERVICE COMMISSION

FILED³

MAY 17 2004

Missouri Public
Service Commission

Missouri Gas Energy
A Division of Southern Union Company

GM-2000-43

GM-2000-500

GM-2000-502

GM-2000-503

GM-2003-0238

May 15, 2004
Report for Calendar Year 2003

**Missouri Gas Energy
Missouri Jurisdictional Bad Debt Write-off
2003**

January		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	(588,973)	3,475
SGSM	(32,510)	153
LGSM		2,539,012
LVM		1,350,582
Total	(621,483)	3,628

February		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	(332,122)	3,664
SGSM	(16,270)	236
LGSM	(123)	2,692,233
LVM	(6,829)	1,261,251
Total	(355,344)	3,900

March		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	(77,267)	3,429
SGSM	18,390	285
LGSM		2,200,314
LVM		1,156,312
Total	(58,876)	3,714

Year to Date - Q1		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	(998,362)	10,568
SGSM	(30,389)	674
LGSM	(123)	-
LVM	(6,829)	-
Total	(1,035,703)	11,242

April		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	493,082	4,348
SGSM	60,195	492
LGSM	71	2
LVM		1,030,113
Total	553,349	4,842

May		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	1,291,779	6,280
SGSM	101,520	545
LGSM	1,573	1
LVM		870,112
Total	1,394,873	6,826

June		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	920,273	4,628
SGSM	56,210	366
LGSM	3,779	1
LVM		604,897
Total	980,262	4,995

Year to Date - Q1 & Q2		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	1,706,772	25,824
SGSM	187,537	2,077
LGSM	5,301	4
LVM	(6,829)	-
Total	1,892,781	27,905

July		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	2,373,709	10,883
SGSM	182,608	1,176
LGSM	(15,360)	5
LVM	1,638	2
Total	2,542,595	12,066

August		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	1,709,354	9,749
SGSM	160,447	939
LGSM	617	2
LVM	168	2
Total	1,870,586	10,692

September		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	716,805	8,958
SGSM	(1,175)	459
LGSM		448,723
LVM	998	1
Total	716,628	9,418

Year to Date - Q1 - Q3		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	6,506,641	55,414
SGSM	529,417	4,651
LGSM	(9,443)	11
LVM	(4,024)	5
Total	7,022,591	60,081

October		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	190,561	8,797
SGSM	(17,810)	567
LGSM	(1,762)	2
LVM		811,973
Total	170,989	9,366

November		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	(933,626)	6,678
SGSM	(68,832)	380
LGSM		837,534
LVM		1,245,809
Total	(1,002,458)	7,058

December		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	(637,290)	5,897
SGSM	(120,934)	339
LGSM	(5,969)	1
LVM		1,434,691
Total	(764,193)	6,237

Calendar Year 2003		
	Dollar amount written off	Number of accounts written off
		Revenue
RSM	5,126,286	76,786
SGSM	321,842	5,937
LGSM	(17,174)	14
LVM	(4,024)	5
Total	5,426,929	82,742

Note:

Revenue amounts shown do not include delayed payment charges or miscellaneous service charge revenue.

Negative write-off amounts indicate net recovery.

**Missouri Gas Energy
Average Speed of Answer
("ASA") in Seconds**

2000

January	81
February	90
March	78
YTD - Q1	83

April	42
May	25
June	20
YTD - Q1&2	56

July	21
August	49
September	58
YTD - Q1-3	52

October	49
November	49
December	200

Calendar Year 2000	64
Maximum Allowable	81 Seconds

2002

January	227
February	98
March	38
YTD - Q1	121

April	29
May	12
June	4
YTD - Q1&2	68

July	5
August	5
September	8
YTD - Q1-3	47

October	67
November	115
December	92

Calendar Year 2002	58
Maximum Allowable	75 Seconds

2001

January	207
February	31
March	84
YTD - Q1	107

April	43
May	67
June	84
YTD - Q1&2	86

July	59
August	140
September	161
YTD - Q1-3	97

October	200
November	161
December	264

Calendar Year 2001	125
Maximum Allowable	75 Seconds

2003

January	85
February	159
March	123
YTD - Q1	122

April	38
May	66
June	57
YTD - Q1&2	88

July	20
August	26
September	117
YTD - Q1-3	77

October	162
November	489
December	220

Calendar Year 2003	130
Maximum Allowable	75 Seconds

**Missouri Gas Energy
Abandoned Call Rate
("ACR") %**

2000

January	6.84%
February	7.51%
March	6.65%
YTD - Q1	6.99%

April	3.46%
May	2.21%
June	1.60%
YTD - Q1&2	4.99%

July	1.95%
August	4.57%
September	6.38%
YTD - Q1-3	4.82%

October	4.84%
November	5.56%
December	16.34%

Calendar Year 2000	6.08%
Maximum Allowable	8.50%

2002

January	15.75%
February	7.22%
March	3.05%
YTD - Q1	8.67%

April	2.25%
May	0.74%
June	0.14%
YTD - Q1&2	5.17%

July	0.19%
August	0.28%
September	0.50%
YTD - Q1-3	3.84%

October	5.43%
November	7.83%
December	6.32%

Calendar Year 2002	4.48%
Maximum Allowable	8.50%

2001

January	16.80%
February	2.68%
March	6.60%
YTD - Q1	9.58%

April	3.91%
May	4.49%
June	6.32%
YTD - Q1&2	7.56%

July	4.19%
August	9.37%
September	13.90%
YTD - Q1-3	8.05%

October	15.00%
November	13.78%
December	16.41%

Calendar Year 2001	9.69%
Maximum Allowable	8.50%

2003

January	6.28%
February	11.09%
March	8.57%
YTD - Q1	8.65%

April	2.87%
May	4.73%
June	4.34%
YTD - Q1&2	6.46%

July	1.28%
August	1.83%
September	7.84%
YTD - Q1-3	5.73%

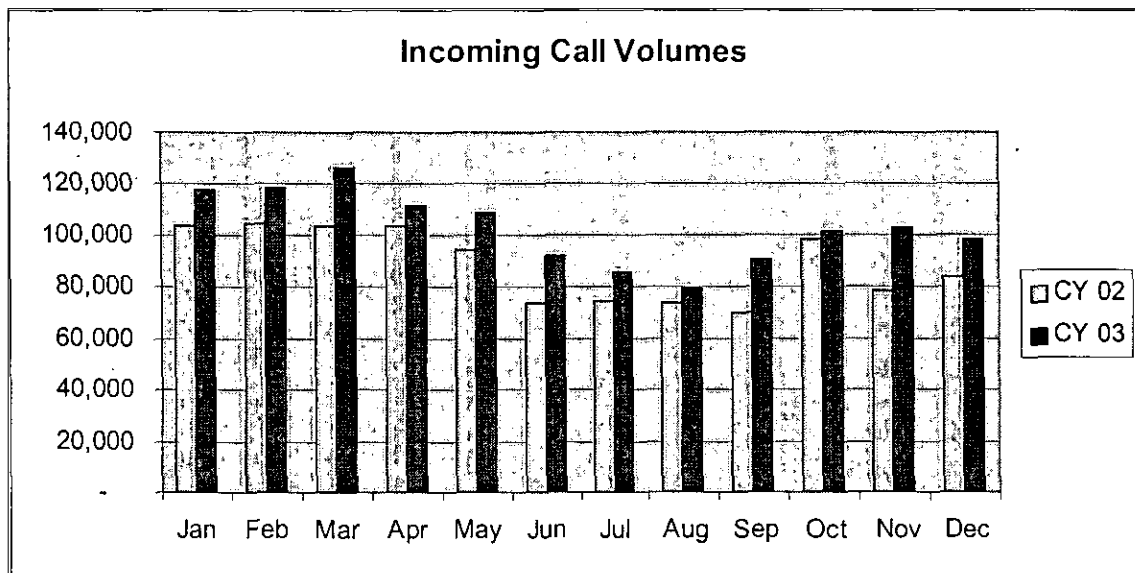
October	10.32%
November	27.69%
December	13.36%

Calendar Year 2003	8.52%
Maximum Allowable	8.50%

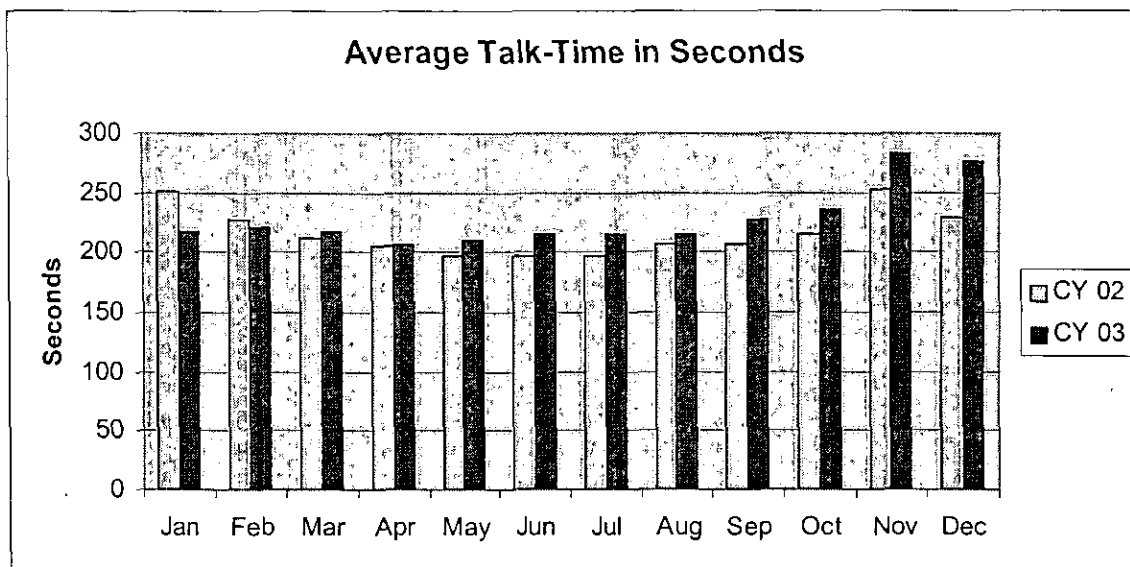
MGE deviated above the abandoned call rate ("ACR") and average speed of answer ("ASA") customer service measures as incorporated in the orders of the Missouri Public Service Commission ("Commission") in Case Nos. GM-2000-500, GM-2000-502, GM-200-503 and GM-2003-0238.¹ Because the actual ACR measure for calendar year 2003 exceeded the 24-month average (while effectively meeting the maximum allowable level for such measure) and the actual ASA measure for calendar year 2003 exceeded both the 24-month average and the maximum allowable level for such measure as incorporated in such Commission orders, MGE offers the following explanation of why MGE believes these figure have increased.

Calendar year 2003 was occasioned by a number of extraordinary events which resulted in an abnormally high number of customer contacts and a significant increase in the length of Average Talk Time ("ATT") in comparison to calendar year 2002. These events were not foreseeable and are not likely to recur with any great frequency in the future.

The following chart compares call volume and average talk time experienced in calendar years 2002 and 2003.



¹ The same customer service measure was also set out in the Stipulation and Agreement approved by the Commission in Case No. GM-2000-43.



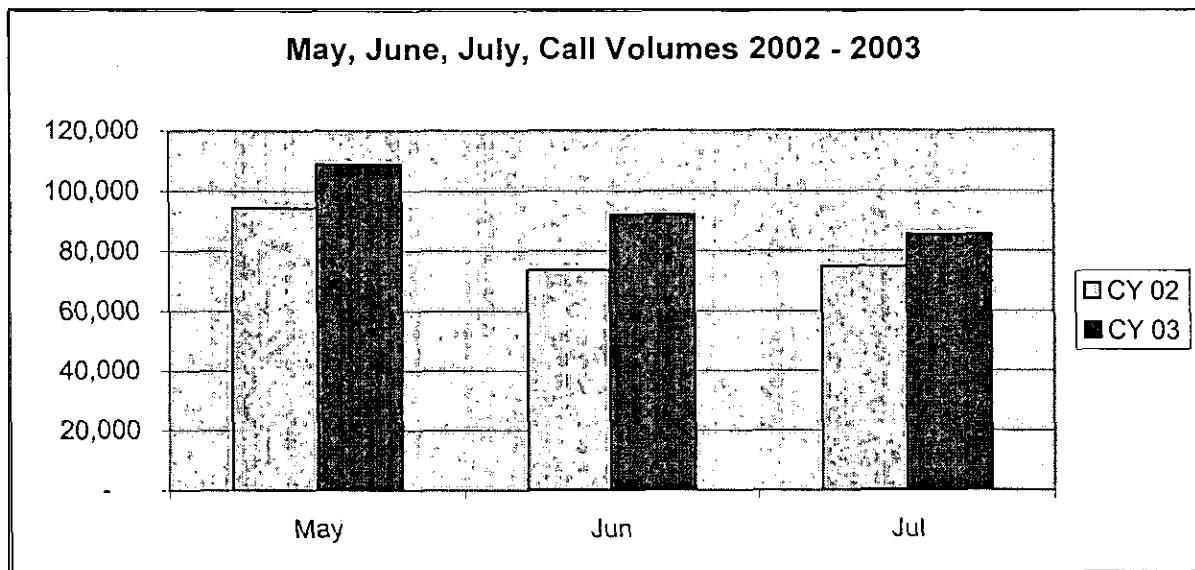
As can be seen by the above charts, call volumes increased by approximately 170,000 in calendar year 2003 in comparison to calendar year 2002, an increase of approximately 16%. In addition, from May through December 2003, ATT—which measures how long our consultants interact with each customer—increased by 22 seconds per call, or approximately 10%, over ATT lengths experienced in calendar year 2002. This resulted in each consultant handling seven (7) fewer calls per day.

Several items influenced the unexpected increase in call volume and ATT during calendar year 2003. These events were either unexpected or had a greater than expected impact on call volumes and ATT. They include: a PGA increase effective March 31, 2003; an unscheduled ABC recalculation in April; customer confusion associated with the process of de-centralizing LIHEAP administration; and an unusually early cold weather snap prior to start of the Cold Weather Rule period.

Historically, natural gas prices have been higher during the winter season (November – March) and lower during the summer season (April – October). However, as a result of market conditions prevailing after an unexpected price spike in late February/March 2003, MGE had to increase its PGA rate effective March 31. This unusual occurrence and the fact that generally higher prices were sustained in the market throughout the summer months was different than customers have come to expect and likely contributed greatly to the increased call volumes and increased ATT experienced during the summer.

MGE has approximately 95,000 ABC (average bill calculation) customers. ABC is MGE's level pay plan. MGE undertook the scheduled ABC recalculation in February, pursuant to the terms of its tariff. As a result of market conditions prevailing after the unexpectedly high gas costs in late February/March, MGE recalculated ABC accounts in April 2003. This recalculation, made to better prepare customers for upcoming winter heating bills, resulted in an approximately 40% increase in ABC payment amounts, on average. MGE typically experiences a significant reduction in calls during summer

months; however, during the months of May, June and July 2003 following the April ABC recalculation and March 31 PGA increase, MGE received over 49,000 more calls than in the same months of the previous year, as shown in the following chart.



MGE also experienced unexpected turnover in the Contact Center during 2003. Vacancies occurred for various reasons, including bids to jobs in Field Operations, terminations for disciplinary reasons and resignations. Between the months of February and June of 2003, six (6) employees bid out of the Customer Service Department and into Field Operations; occasionally, the same employee bid out more than once. Only two (2) of these six (6) ended up being permanent transfers out of Customer Service, demonstrating the uncertainties created by not knowing whether the employee who has bid out will or will not successfully complete the 60-day probationary period which significantly complicate and delay the process of making a decision whether to re-hire. The complication created by this uncertainty is compounded by the fact that it typically takes about five (5) weeks to complete the hiring process and about eight (8) weeks to train a new consultant once that consultant has been hired. In September 2003, just after training began for five (5) newly hired consultants, four (4) employees in the contact center unexpectedly ceased employment with MGE.

MGE's service territory also experienced an unusual snap of cold weather in September 2003 that led to higher than expected call volumes. Customers who typically wait for the Cold Weather Rule period to call for service connection jammed the phone lines in September. MGE's contact center received 20,353 more calls in September 2003 than in September 2002. This increase in call volumes was due at least in part to the early cold and wet weather experienced on September 18 to 20 and September 28 to 30. The impact of this unexpected increase in call volumes was compounded by the unexpected departure of four (4) customer consultants.

During 2003, LIHEAP (low income heating energy assistance program) administration shifted from the Division of Family Services to numerous agencies in outlying serving areas. This major overhaul to an already complex process resulted in customer confusion about administration. The problems began when customers received their assistance packages approximately three (3) weeks later than normal from the agencies. MGE received a large number of inquiries regarding whom to call, how to qualify, where is my assistance package, etc. MGE works with approximately 15,000 LIHEAP customers annually and estimates that several thousand calls were received from them during November and December. This additional call volume was unexpected.

In summary, the unexpected events described above caused the ACR to exceed the 24-month average and the ASA to exceed the maximum allowable level as incorporated in the Commission's orders in Case Nos. GM-2000-500, GM-2000-502, GM-2000-503 and GM-2003-0238. It is unlikely for these phenomena to recur with any great frequency. MGE does not believe that it is reasonable or appropriate to staff at the levels necessary to handle such infrequent and unforeseeable peak volume situations. Therefore, MGE does not believe it is necessary to expend any costs in order to improve the ACR and ASA measures such that MGE meets or beats the maximum allowable levels for such measures during calendar year 2004.

MGE strives to seek a balance between adequate staffing to effectively handle the workload while providing service at a reasonable cost, and will continue to make adjustments to enhance its operations and service delivery to customers. Although MGE was pleased with calendar year 2002 performance it made plans to hire an additional five Contact Center Consultants prior to the winter of 2003-2004. In addition, MGE planned on increasing its utilization of employees in the Account Services and Billing Services departments to assist with high call volume periods. After listening to energy assistance agencies regarding the need for increased ability to handle their calls, MGE responded by placing agency calls on a high priority level and in September 2003 assigned four additional consultants to the Energy Assistance group to handle those calls. Over time, MGE has also upgraded its web site as a means of customer contact and MGE will continue to stress web usage as another customer option. During calendar year 2003, there were approximately 232,500 hits on the company's web site. MGE also invested approximately \$350,000 to upgrade its Interactive Voice Response ("IVR") system to offer customers a greater choice of automated transactions. MGE will continue to seek out opportunities to enhance operations and service delivery to customers while maintaining reasonable cost levels.

Missouri Gas Energy Personnel

Personnel responsible for
handling MoPSC
complaints/inquiries

Shirley Bolden phone: (816) 360-5528
David Curry phone: (816) 360-5577

After hours contact
personnel

home phone / pager

Ron Crow (816) 781-7954 / NA
Shirley Bolden (816) 763-9116 / (816) 995-0727
Kim Lambert (816) 587-0482 / (816) 995-0813

Customer service
management
training personnel

Ron Crow phone: (816) 360-5504
Shirley Bolden phone: (816) 360-5528
Kim Lambert phone: (816) 360-5585
Carl Ricketts phone: (816) 360-5877

Process and level of authority for discontinuance of service to a Registered Customer

- 1) Registered Customers are separated from daily non-pay shut off accounts and sent to Customer Advisors.
- 2) Customer Advisor reviews account and makes contact with customer or designated 3rd party contact.
- 3) If decision is made to discontinue service, Customer Advisor contacts an officer of the company.
- 4) Our practice is not to discontinue service to Registered Customers during the Cold Weather Rule ("CWR") period (November 1 through March 31).

MoPSC Inquiries/Complaints
(Provided to MGE by MoPSC staff)

Southern Union Company -Complaint Summary 1st Qtr 2003 **

Complaints by Issue Type

Complaint Issue:	Complaints
Billing	20
Rates/Tariff	0
Rules/Regulations	32
Service Quality	19
Service Quality/Safety	0
Other/Misc	2
Total	73

**Corrected numbers
provided to MGE
by Gay Fred in
November 2003

Complaints by Month

Month:	Complaints	Inquires*	Total
January	28	0	28
February	14	2	16
March	29	0	29
Total			73

Complaints by County

County:	Complaints
Adair	0
Buchanan	8
Carroll	
Cass	
Cedar	1
Christian	
Clay	4
Cooper	
Dekalb	
Jackson	55
Jasper	
Johnson	
Lafayette	1
Lawrence	
Newton	1
Platte	2
Saline	1
Total	73

Definitions:

Complaint: An issue typically involving a utility billing, payment, service or safety issue that requires PSC staff to contact the utility company for mediation or resolution. It does not necessarily mean the utility has violated Commission rules and regulations or the company's tariff.

Inquiry: An issue PSC staff can resolve without contacting the utility company. Inquiries also incorporate EFIS Quick Hits which includes "referrals" to other information sources on matters which the Missouri PSC has no jurisdiction (cable television, Internet service providers, satellite dishes, cellular, etc).

***Exception to Inquiry-** An Inquiry that was changed to a complaint due to the need to contact the utility for consumer account information.

Southern Union Company - Complaint Summary 2nd Qtr 2003 **

Complaints by Issue

Complaint Issue:	Complaints
Billing	59
Rates/Tariff	11
Rules/Regulations	23
Service Quality	12
Service Quality/Safety	3
Other/Misc	0
Total	108

**Corrected numbers
provided to MGE
by Gay Fred in
November 2003

Complaints by Month

Month:	Complaints	Inquires*	Total
April	22	3	25
May	31	4	35
June	46	2	48
Total			108

Complaints by County

County:	Complaints
Adair	1
Buchanan	4
Carroll	2
Cass	1
Cedar	
Christian	1
Clay	9
Cooper	1
Dekalb	3
Jackson	77
Jasper	3
Johnson	3
Lafayette	
Lawrence	
Newton	
Platte	3
Saline	
Total	108

Definitions:

Complaint: An issue typically involving a utility billing, payment, service or safety issue that requires PSC staff to contact the utility company for mediation or resolution. It does not necessarily mean the utility has violated Commission rules and regulations or the company's tariff.

Consumer Inquiry: An issue PSC staff can resolve without contacting the utility company. Inquiries also incorporate EFIS Quick Hits which includes "referrals" to other information sources on matters which the Missouri PSC has no jurisdiction (cable television, Internet service providers, satellite dishes, cellular, etc).

***Exception to Inquiry-** An Inquiry that was changed to a complaint due to the need to contact the utility for consumer account information.

Southern Union Company - Complaints Summary 3rd Qtr 2003

Complaints by Issue

Complaint Issue:	Complaints
Billing	24
Rates/Tariff	4
Rules/Regulations	28
Service Quality	34
Service Quality/Safety	
Other/Misc	2
Total	92

Complaints by Month

Month:	Complaints	Inquires*	Total
July	27	0	27
August	27	0	27
September	35	3	38
Total			92

Complaints by County

County:	Complaints
Adair	
Barry	1
Buchanan	3
Carroll	3
Cass	3
Cedar	1
Christian	1
Clay	4
Cooper	
Dekalb	
Jackson	69
Jasper	3
Johnson	2
Lafayette	
Lawrence	2
Newton	
Platte	
Saline	
Total	92

Definitions:

Complaint: An issue typically involving a utility billing, payment, service or safety issue that requires PSC staff to contact the utility company for mediation or resolution. It does not necessarily mean the utility has violated Commission rules and regulations or the company's tariff.

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***Exception to Inquiry-** An Inquiry that was changed to a complaint due to the need to contact the utility for consumer account information.

Southern Union Company - 4th Qtr 2003

Complaint Issue:	Complaints
Billing	35
Rates/Tariff	4
Rules/Regulations	35
Service Quality	54
Service Quality/Safety	
Other/Misc	
Total	128

Provided to MGE
by Gay Fred
May 6, 2004

Complaints by Month

Month:	Complaints	Inquires*	Total
October	57		
November	39		
December	32		
Total	128	0	128

County:	Complaints
Adair	
Barton	1
Buchanan	7
Carroll	
Cass	4
Cedar	
Christian	
Clay	7
Clinton	1
Cooper	
Dade	1
Dekalb	
Greene	1
Howard	2
Jackson	94
Jasper	3
Johnson	3
Lafayette	
Lawrence	1
McDonald	1
Newton	
Platte	1
Saline	1
Total	128

Complaint: An issue typically involving a utility billing, payment, service or safety issue that requires PSC staff to contact the utility company for mediation or resolution. It does not necessarily mean the utility has violated Commission rules and regulations or the company's tariff.

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Southern Union Company - Complaint Summary for 2003

Complaints by Issue Type

Complaint Issue:	Complaints
Billing	130
Rates/Tariff	19
Rules/Regulations	120
Service Quality	124
Service Quality/Safety	3
Other/Misc	5
Total	401

Provided to MGE
by Gay Fred
May 6, 2004

Complaints by Month

Month:	Complaints	Inquires*	Total
January	28	0	28
February	14	2	16
March	29	0	29
April	22	3	25
May	31	4	35
June	46	2	48
July	27	0	27
August	27	0	27
September	35	3	38
October	57	0	57
November	39	0	39
December	32	0	32
Total	387	14	401

Complaints by County

County:	Complaints
Adair	1
Buchanan	22
Barton	1
Carroll	5
Cass	8
Cedar	2
Christian	2
Clay	24
Clinton	1
Cooper	1
Dade	1
Dekalb	3
Greene	1
Howard	2
Jackson	295
Jasper	9
Johnson	8
Lafayette	1
Lawrence	3
McDonald	1
Newton	1
Platte	7
Saline	2
Total	401

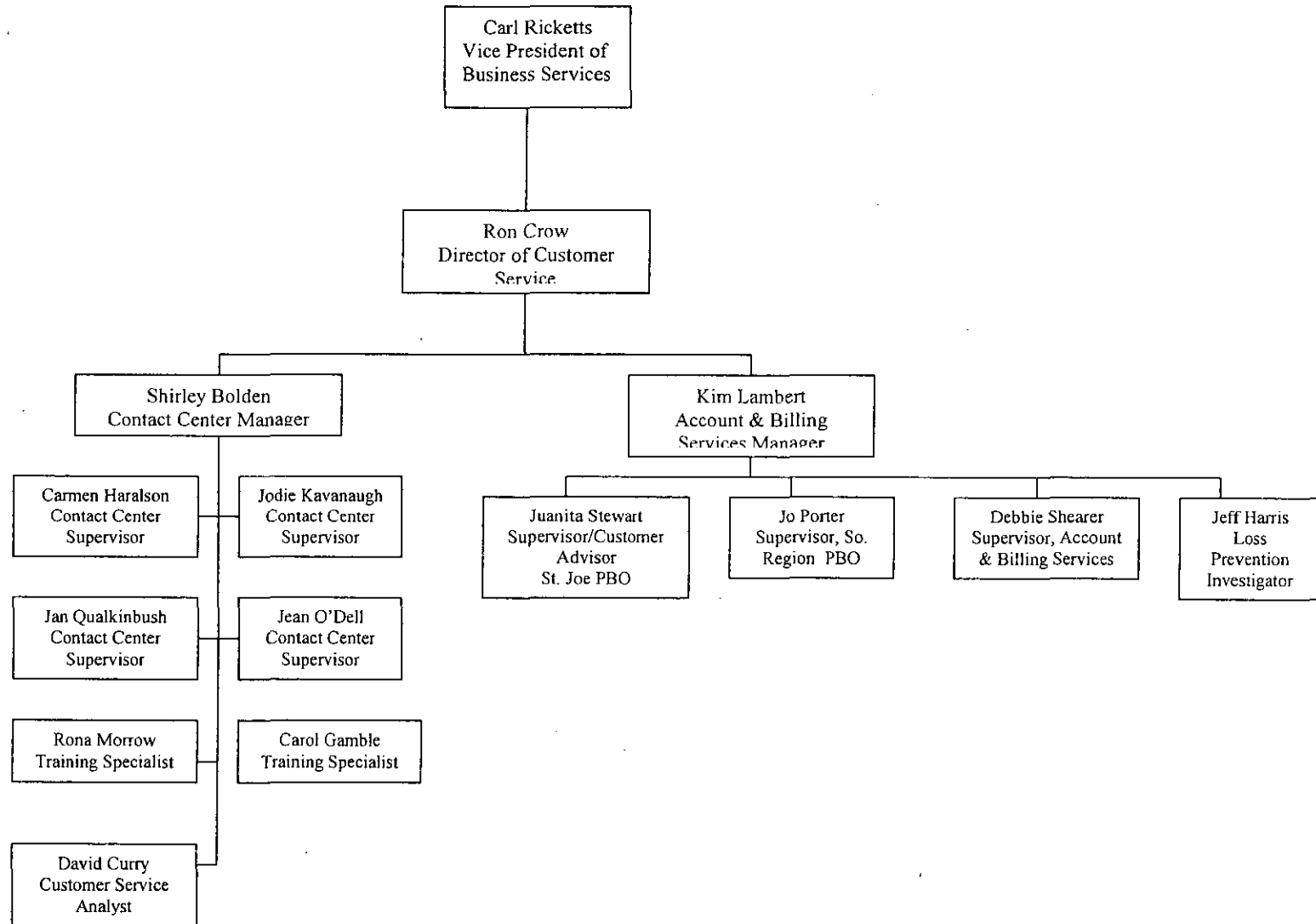
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***Exception to Inquiry-** An Inquiry that was changed to a complaint due to the need to contact the utility for consumer account information.

Customer Service Organization Chart



Customer Service Staffing

Missouri Gas Energy
Customer Service Staff
January - March 2003

	January Full Time	January Part Time	Term/Resign New Hires	February Full Time	February Part Time	Term/Resign New Hires	March Full Time	March Part Time
Director	1			1			1	
Manager	2			2			2	
Supervisor	6			6			6	
Advisor	3			3			3	
Administrative Assistant	1			1			1	
Analyst	1			1			1	
Trainer	2			2			2	
Quality Assurance	0			0			0	
Loss Prevention Investigator	0		1	1			1	
Contact Center	46	7	1	47	7	5	52	7
Training Class	0	5		0	5	-5	0	0
Billing Services	12	2		12	2		12	2
Account Services	11	0		11	0	1	12	0
Seasonal Employees	0	0		0	0		0	0
PBO Joplin	4			4			4	
PBO Monett	2			2			2	
PBO St. Joseph	3			3			3	
TOTAL	94	14	2	96	14	1	102	9
GRAND TOTAL	108			110			111	

Missouri Gas Energy
Customer Service Staff
April - June 2003

	April Full Time	April Part Time	Term/Resign New Hires	May Full Time	May Part Time	Term/Resign New Hires	June Full Time	June Part Time
Director	1			1			1	
Manager	2			2			2	
Supervisor	6			6			6	
Advisor	3			3			3	
Administrative Assistant	1			1			1	
Analyst	1			1			1	
Trainer	2			2			2	
Quality Assurance	0			0			0	
Loss Prevention Investigator	1			1			1	
Contact Center	52	7	-2	50	7	-1	49	7
Training Class	0	0		0	0		0	0
Billing Services	12	2		12	2	1	12	3
Account Services	11	0	0	11	0		11	0
Seasonal Employees	0	0		0	0		0	0
PBO Joplin	4			4			4	
PBO Monett	2			2			2	
PBO St. Joseph	3			3			3	
TOTAL	101	9	-2	99	9	0	98	10
GRAND TOTAL	110			108			108	

Missouri Gas Energy
Customer Service Staff
July - September 2003

	July Full Time	July Part Time	Term/Resign New Hires	August Full Time	August Part Time	Term/Resign New Hires	September Full Time	September Part Time
Director	1			1			1	
Manager	2			2			2	
Supervisor	6			6		1	7	
Advisor	3			3		-3	0	
Administrative Assistant	1		-1	0			0	
Analyst	1		0	1			1	
Trainer	2			2			2	
Quality Assurance	0			0			0	
Loss Prevention Investigator	1			1			1	
Contact Center	46	7	-1	45	7	-3	42	7
Training Class	0	0		0	0	5	5	0
Billing Services	11	3		11	3		11	3
Account Services	16	0	-1	15	0	1	16	0
Seasonal Employees	0	0		0	0		0	0
PBO Joplin	4			4			4	
PBO Monett	2			2			2	
PBO St. Joseph	3			3			3	
TOTAL	99	10	-3	96	10	1	97	10
GRAND TOTAL	109			106			107	

9/18, Rae Lewis and Carlotta Roberts transfer from Customer Service to the Customer and Government Relations department.
9/18, Juanita Stewart, Customer Advisor, continues as supervisor for St Joseph office

Missouri Gas Energy
Customer Service Staff
October - December 2003

	October Full Time	October Part Time	Term/Resign New Hires	November Full Time	November Part Time	Term/Resign New Hires	December Full Time	December Part Time
Director	1			1			1	
Manager	2			2			2	
Supervisor	7			7			7	
Administrative Assistant	0			0			0	
Analyst	1			1			1	
Trainer	2			2			2	
Quality Assurance	0			0			0	
Loss Prevention Investigator	1			1			1	
Contact Center	40	6		40	6	5	45	6
Training Class	5	0		5	0	-5	0	0
Billing Services	12	2		12	2		12	2
Account Services	16	0		16	0		16	0
Seasonal Employees	0	0		0	0		0	0
PBO Joplin	4			4			4	
PBO Monett	2			2			2	
PBO St. Joseph	3			3			3	
TOTAL	96	8	0	96	8	0	96	8
GRAND TOTAL	104			104			104	

Number of Estimated Bills
(Including consecutive estimates)

ESTIMATED METER SUMMARY FOR JANUARY-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	1	0	0	0	0	0	0	0	0	1
MONETT, MO	0	0	0	0	0	0	0	0	0	0
Region Total:	1	0	0	0	0	0	0	0	0	1
YEAR-TO-DATE TOTALS	9	0	0	0	0	0	0	0	0	9
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	26	0	0	2	0	0	0	0	0	28
LEE'S SUMMIT, MO	2	0	0	0	0	0	0	0	0	2
ST. JOSEPH, MO	3	0	0	0	0	0	0	0	0	3
KANSAS CITY NORTH										
Region total:	31	0	0	2	0	0	0	0	0	33
YEAR-TO-DATE TOTALS	194	9	3	3	1	0	0	1	0	211

NOTE: Beginning a new fiscal year - 2003 (July '02-June'03)

ESTIMATED METER SUMMARY FOR FEBRUARY-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	1	0	0	0	0	0	0	0	0	1
MONETT, MO	0	0	0	0	0	0	0	0	0	0
Region Total:	1	0	0	0	0	0	0	0	0	1
YEAR-TO-DATE TOTALS	10	0	0	0	0	0	0	0	0	10
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	14	1	0	0	0	0	0	0	0	15
LEE'S SUMMIT, MO	3	0	0	0	0	0	0	0	0	3
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	3	0	0	0	0	0	0	0	0	3
Region total:	20	1	0	0	0	0	0	0	0	21
YEAR-TO-DATE TOTALS	214	10	3	3	1	0	0	1	0	232

NOTE: Beginning a new fiscal year - 2003 (July '02-June'03)

ESTIMATED METER SUMMARY FOR MARCH-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	0	0	0	0	0	0	0	0	0	0
MONETT, MO	0	0	0	0	0	0	0	0	0	0
Region Total:	0	0	0	0	0	0	0	0	0	0
YEAR-TO-DATE TOTALS	10	0	0	0	0	0	0	0	0	10
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	22	0	0	0	0	0	0	0	0	22
LEE'S SUMMIT, MO	1	0	0	0	0	0	0	0	0	1
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	3	0	0	0	0	0	0	0	0	3
Region total:	26	0	0	0	0	0	0	0	0	26
YEAR-TO-DATE TOTALS	240	10	3	3	1	0	0	1	0	258

NOTE: Beginning a new fiscal year - 2003 (July '02-June'03)

ESTIMATED METER SUMMARY FOR APRIL-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	0	0	0	0	0	0	0	0	0	0
MONETT, MO	0	0	0	0	0	0	0	0	0	0
Region Total:	0	0	0	0	0	0	0	0	0	0
YEAR-TO-DATE TOTALS	10	0	0	0	0	0	0	0	0	10
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	45	9	0	0	0	0	0	0	0	54
LEE'S SUMMIT, MO	0	0	0	0	0	0	0	0	0	0
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	3	1	0	0	0	0	0	0	0	4
Region total:	48	10	0	0	0	0	0	0	0	58
YEAR-TO-DATE TOTALS	288	20	3	3	1	0	0	1	0	316

NOTE: Beginning a new fiscal year - 2003 (July '02-June'03)

ESTIMATED METER SUMMARY FOR MAY-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	0	0	0	0	0	0	0	0	0	0
MONETT, MO	0	0	0	0	0	0	0	0	0	0
Region Total:	0	0	0	0	0	0	0	0	0	0
YEAR-TO-DATE TOTALS	10	0	0	0	0	0	0	0	0	10
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	15	1	2	0	0	0	0	0	0	18
LEE'S SUMMIT, MO	1	0	0	0	0	0	0	0	0	1
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	1	0	0	0	0	0	0	0	0	1
Region total:	17	1	2	0	0	0	0	0	0	20
YEAR-TO-DATE TOTALS	305	21	5	3	1	0	0	1	0	336

NOTE: Beginning a new fiscal year - 2003 (July '02-June'03)

ESTIMATED METER SUMMARY FOR JUNE-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	3	0	0	0	0	0	0	0	0	0
MONETT, MO	0	0	0	0	0	0	0	0	0	0
Region Total:	3	0	0	0	0	0	0	0	0	3
YEAR-TO-DATE TOTALS	13	0	0	0	0	0	0	0	0	13
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	14	3	0	0	0	0	0	0	0	17
LEE'S SUMMIT, MO	0	0	0	0	0	0	0	0	0	0
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	17	0	0	0	0	0	0	0	0	17
Region total:	31	3	0	0	0	0	0	0	0	34
YEAR-TO-DATE TOTALS	336	24	5	3	1	0	0	1	0	370

NOTE: Beginning a new fiscal year - 2003 (July '02-June'03)

ESTIMATED METER SUMMARY FOR JULY-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	1	0	0	0	0	0	0	0	0	1
MONETT, MO										
Region Total:	1	0	0	0	0	0	0	0	0	1
YEAR-TO-DATE TOTALS	1	0	0	0	0	0	0	0	0	1
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	6	2	1	0	0	0	0	0	0	9
LEE'S SUMMIT, MO	1	0	0	0	0	0	0	0	0	1
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	6	0	0	0	0	0	0	0	0	6
Region total:	13	2	1	0	0	0	0	0	0	16
YEAR-TO-DATE TOTALS	13	2	1	0	0	0	0	0	0	16

NOTE: Beginning a new fiscal year - 2004 (July '03-June'04)

ESTIMATED METER SUMMARY FOR AUGUST-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	1	0	0	0	0	0	0	0	0	1
MONETT, MO	0	0	0	0	0	0	0	0	0	0
Region Total:	1	0	0	0	0	0	0	0	0	1
YEAR-TO-DATE TOTALS	1	0	0	0	0	0	0	0	0	1
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	8	2	1	0	0	0	0	0	0	11
LEE'S SUMMIT, MO	2	0	0	0	0	0	0	0	0	2
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	0	0	0	0	0	0	0	0	0	0
Region total:	10	2	1	0	0	0	0	0	0	13
YEAR-TO-DATE TOTALS	10	2	1	0	0	0	0	0	0	13

NOTE: Beginning a new fiscal year - 2004 (July '03-June'04)

ESTIMATED METER SUMMARY FOR Sep-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	1	0	0	0	0	0	0	0	0	1
MONETT, MO										
Region Total:	1	0	0	0	0	0	0	0	0	1
YEAR-TO-DATE TOTALS	1	0	0	0	0	0	0	0	0	1
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY, MO	10	0	1	0	0	0	0	0	0	11
LEE'S SUMMIT, MO	2	0	0	0	0	0	0	0	0	2
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	2	0	0	0	0	0	0	0	0	2
Region total:	14	0	1	0	0	0	0	0	0	15
YEAR-TO-DATE TOTALS	13	2	1	0	0	0	0	0	0	16

NOTE: Beginning a new fiscal year - 2004 (July '03-June'04)

ESTIMATED METER SUMMARY FOR OCT-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	5	0	0	0	0	0	0	0	0	3
MONETT, MO										
Region Total:	5	0	0	0	0	0	0	0	0	5
YEAR-TO-DATE TOTALS	6	0	0	0	0	0	0	0	0	6
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO	0	0	0	0	0	0	0	0	0	0
WARRENSBURG, MO	1	0	0	0	0	0	0	0	0	1
KANSAS CITY, MO	41	4	1	0	0	0	0	0	0	46
LEE'S SUMMIT, MO	6	1	0	0	0	0	0	0	0	7
ST. JOSEPH, MO	0	0	0	0	0	0	0	0	0	0
KANSAS CITY NORTH	4	0	0	0	0	0	0	0	0	4
Region total:	52	5	1	0	0	0	0	0	0	58
YEAR-TO-DATE TOTALS	89	11	5	0	0	0	0	0	0	105

NOTE: Beginning a new fiscal year - 2004 (July '03-June'04)

ESTIMATED METER SUMMARY FOR NOV-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO	0	0	0	0	0	0	0	0	0	0
MONETT, MO	0	0	0	0	0	0	0	0	0	
Region Total:	0	0	0	0	0	0	0	0	0	0
YEAR-TO-DATE TOTALS	6	0	0	0	0	0	0	0	0	6
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO										0
WARRENSBURG, MO										0
KANSAS CITY, MO	16	0	2	0	0	0	0	0	0	18
LEE'S SUMMIT, MO	4	0	0	0	0	0	0	0	0	4
ST. JOSEPH, MO										0
KANSAS CITY NORTH	3	0	0	0	0	0	0	0	0	3
Region total:	23	0	2	0	0	0	0	0	0	25
YEAR-TO-DATE TOTALS	112	11	7	0	0	0	0	0	0	130

NOTE: Beginning a new fiscal year - 2004 (July '03-June'04)

ESTIMATED METER SUMMARY FOR DEC-03

RE: SOUTHERN REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
JOPLIN, MO										0
MONETT, MO										0
Region Total:										0
YEAR-TO-DATE TOTALS	6									6
RE: KANSAS CITY REGION	1 month	2 months	3 months	4 months	5 months	6 months	7 months	8 months	9+ months	Grand Total
Location:										
INDEPENDENCE, MO										0
WARRENSBURG, MO	1									1
KANSAS CITY, MO	31	1								32
LEE'S SUMMIT, MO	1									1
ST. JOSEPH, MO										0
KANSAS CITY NORTH	3									3
Region total:	36	1	0	0	0	0	0	0	0	37
YEAR-TO-DATE TOTALS	148	12	7	0	0	0	0	0	0	167

NOTE: Beginning a new fiscal year - 2004 (July '03-June'04)

List of Customer Pay Station Locations

Paystation Listing

Agent #	Name	Address			Telephone #	ATM/Bank on Site	Main Contact	Hours of Operation AM to PM unless specified	Automated / Manual	Location KC / Southern
901	Apple Market	1215 E 47th St	Kansas City	64110	816-931-7153	Y	Glen/Don Gipson	7:00am - 7:00pm	Automated	KC
911	Apple Market #115	3719 Independence Ave	Kansas City	64124	816-241-9558	Y	Brenda	8:00am - 8:00pm	Automated	KC
808	Balloon's "R" Us	5939 Troost Ave.	Kansas City	64110	816-361-0308		Gloria Ellington	9:00am - 6:00pm Mon. Sat.	Automated	KC
915	Carthage Water & Electric	149 E 3rd St	Carthage	64836	417-237-7300		Jane Hummer	8:00am - 4:00pm	Automated	Southern
932	Central Bank of KC	2301 Independence Ave	Kansas City	64124	816-483-1210	Y	Pauley Heishman	7:00am - 6:00pm	Automated	KC
933	Central Bank of KC	3740 Truman Rd	Kansas City	64127	816-231-6615	Y	Pauley Heishman	8:00am - 5:30pm	Automated	KC
941	City Hall	203 Paul St	Pleasant Hill	64080	816-540-3192		Sandy	8:00am - 5:00pm	Automated	KC
803	City of Independence - Water	11610 E Truman Rd	Independence	64050	816-325-7696		Duane Wheaton	8:00am - 5:00pm	Automated	KC
947	Dryden Drug Co	401 Main St	Belton	64012	816-331-4747		Jack Dryden	M - F 8:30 - 6:00, Sat 8:30 - 3, Sun 10 - 3	Automated	KC
807	Hy-Vee Food & Drug #1380	301 NE Rice Rd	Lee's Summit	64086	816-524-5760	Y	Matt/Randy/Linda	6:00am - 10:00pm	Automated	KC
802	Hy-Vee Food & Drug-West	310 SW Ward Rd	Lee's Summit	64086	816-554-2200	Y	Scott Walters/Angie/Rachel	7:00am - 10:00pm	Automated	KC
902	Sylvia's Appliances	2010 Main	Higginsville	64037	660-584-7445		Sylvia Singleton	9:00am - 5:00pm Sat 9:00am - 12:00pm	Automated	KC
913	Jon's Pharmacy	219 Washington	Neosho	64850	417-451-3775		Susan Genisio	9:00am - 6:00pm Sat 9:00 - 1:00	Automated	Southern
801	Lona's Business Group	924 W 24th St	Kansas City	64108	816-221-5662		Thomas Lona	10:00am - 7:00pm Sat 10:00am - 5:00pm	Automated	KC
917	McNeal's Bilo	410 E Young St	Warrensburg	64093	660-429-1188	Y	Judy	7:00am - 8:00pm	Automated	KC
	PBO - Joplin	520 E 5th	Joplin	64801	417-626-4803		Jo Porter	8:00am - 5:00pm		Southern

Agent #	Name	Address			Telephone #	ATM/Bank on Site	Main Contact	Hours of Operation AM to PM unless specified	Automated / Manual	Location KC / Southern
	PBO - Monett	207 Pine St	Monett	65708	417-236-3200		Jo Porter	8:00am - 5:00pm		Southern
	PBO - St Joseph	1405 N Belt	St Joseph	64506	816-387-4412		Juanita Stewart	8:00am - 5:00pm		St Joseph
910	Price Chopper #102	1030 W 103rd St	Kansas City	64114	816-942-4200	Y	Cathy/Ray Tidwell	8:00am - 7:30pm	Automated	KC
905	Price Chopper #105	5800 Wilson Rd	Kansas City	64123	816-483-6948	Y	Mgr. Cathy Beddow	8:00am - 8:00pm	Automated	KC
906	Price Chopper #106	8700 E 63rd St	Kansas City	64133	816-358-2270	Y	Mgr. Cathy Beddow	8:00am - 8:00pm	Automated	KC
944	Price Cutter #17	1013 Hwy. 60	Republic	65738	417-891-2302	Y	Brian Wityk	9:00am - 8:00pm	Automated	Southern
946	Price Cutter #23	1503 W. MacArthur	Webb City	64870	417-891-2302	Y	Brian Wityk	8:00am - 8:00pm	Automated	Southern
930	Price Cutter Plus #2106	400 N Massey Blvd	Nixa	65714	417-891-2302	Y	Brian Wityk	8:00am - 8:00pm	Automated	Southern
919	Professional Organization Mgmt	1103 Main	Blue Springs	64015	816-229-1666		Lois Wolfe	9:00am - 12:00pm 1:00pm - 5:00pm	Automated	KC
945	Ramey's #5	2150 E Cleveland	Monett	65708	417-891-2302	Y	Brian Wityk	8:00am - 8:00pm	Automated	Southern
805	Richard's Sunfresh	18001 E 24 Hwy	Independence	64056	816-796-0880	Y	Brenda/Bobbie	9:00am - 5:30pm	Automated	KC
923	S&N Supermarket (Nance's)	314 Concourse	Excelsior Springs	64024	816-630-6215	N	Bob Nance	7:30am - 6:30pm	Automated	KC
929	Smitty's #2110	1850 S Maiden Ln	Joplin	64801	417-891-2302	Y	Brian Wityk	8:00am - 8:30pm	Automated	Southern
907	Sunfresh #107	2415 NE Vivion Rd	Kansas City	64118	816-454-7887	Y	Debbie	8:00am - 8:00pm	Automated	KC
Brnch 151	United Missouri Bank	1123 South 10th St	St Joseph	64503	816-233-8284	Y	Denise Kretzer	M-Th 9:00 - 5:00 9:00 - 6:00	Manual (Courier)	St Joseph
Brnch 152	United Missouri Bank	3601 Mitchell	St Joseph	64507	816-233-8284	Y	Denise Kretzer	M-Th 9:00 - 5:00 9:00 - 6:00	Manual (Courier)	St Joseph
Brnch 153	United Missouri Bank	2501 Fredrick	St Joseph	64501	816-233-8284	Y	Denise Kretzer	M-Th 9:00 - 5:00 9:00 - 6:00	Manual (Courier)	St Joseph
Brnch 173	United Missouri Bank	1 Victory Dr	Liberty	64068	816-792-6700	Y	Colleen	7:00am - 6:00pm Sat 8:00am - 12:00	Manual (Courier)	KC

Agent #	Name	Address			Telephone #	ATM/Bank on Site	Main Contact	Hours of Operation AM to PM unless specified	Automated / Manual	Location KC / Southern
Brnch 183	United Missouri Bank	6400 Independence Ave	Kansas City	64125	816-231-1400	Y	Cindy Marshall	M-Th 9:00 - 4:30 9:00 - 6:00 Fri	Manual (Courier)	KC
Brnch 184	United Missouri Bank	4001 Blue Ridge CutOff	Kansas City	64133	816-860-3308	Y	Debbie	M-Th 9:00 - 4:30 9:00 - 6:00 Fri	Manual (Courier)	KC
Brnch 159	United Missouri Bank	501 W Main	Savannah	64485	816-324-3113	Y	Brenda	M-Th 9:00 - 5:00 9 - 6 Sat 8-12 Fri	Manual (Courier)	Northern
806	Watt Drug	11724 E. 23rd Street	Independence	64050	816-461-8844		Lynn Ballard	Mon-Wed 9-4:30 Thurs only 9-5:30 1st Sat of ea mo open till noon	Automated	KC
916	Woods Market	700 E Hwy 154	El Dorado Springs	64744	417-876-2831	N	Don Woods	7:00am - 9:00pm	Automated	Southern

Percent of Service Appointments Kept

Missouri Gas Energy
Percent of Service Appointments Kept

2003	% Kept
April through June	88.04%
Quarter 2	88.04%

July through September	87.88%
Quarters 2 & 3	87.96%

October through December	87.71%
Quarters 2, 3 & 4	87.88%

**Average Response Time to
Commission-Forwarded Complaints**

Missouri Gas Energy
Average Response Time to Commission-Forwarded Complaints

2003	Answer Within 2 Business Days
April	92.00%
May	85.71%
June	83.33%
Quarter 2	86.11%

July	74.07%
August	72.73%
September	76.74%
Quarters 2 & 3	81.00%

October	79.63%
November	76.09%
December	77.42%
Quarters 2, 3 & 4	79.76%

**Insulation of Southern Union's MGE Operating
Division From Panhandle Business**

Certificate of Compliance

Certificate of Compliance

STATE OF PENNSYLVANIA)
)
COUNTY OF LUZERNE) ss.

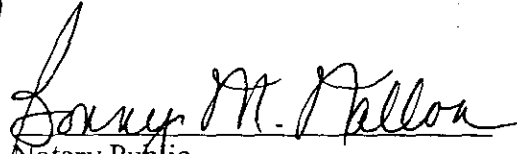
Richard N. Marshall, Vice President and Treasurer for Southern Union Company, of lawful age, on his oath states that for the period June 11, 2003 (the closing date of the Panhandle acquisition by Southern Union Company) through June 30, 2003:

- Panhandle Energy or any direct or indirect subsidiary of Southern Union acquiring or owning any equity interests in Panhandle were owned and operated as a separate subsidiary of Southern Union Company;
- Southern Union Company and MGE did not, directly or indirectly, allow any Panhandle debt to be recourse to them; pledge Southern Union or MGE equity as collateral or security for the debt of any Panhandle entity; give, transfer, invest, contribute or loan to any Panhandle entity, any equities or cash;
- Southern Union did not transfer to Panhandle or any subsidiary thereof, directly or indirectly, assets necessary and useful in providing service to MGE's Missouri customers;
- Southern Union did not, directly or indirectly, enter into any "make-well" agreements, or guarantee the notes, debentures, debt obligations or other securities of any Panhandle entity;
- Southern Union did not adopt indemnify, guarantee or assume responsibility for payment of, either directly or indirectly, any of the current or future liabilities of any Panhandle entity;

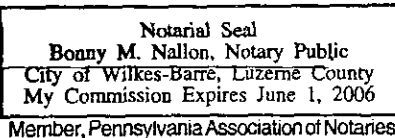
that he has knowledge of the matters set forth above; and that such matters are true and correct to the best of his knowledge and belief.


Richard N. Marshall

Subscribed and sworn this 1st day of August, 2003.


Notary Public

My Commission expires: _____



Certificate of Compliance

STATE OF PENNSYLVANIA)
)
COUNTY OF LUZERNE) ss.

Richard N. Marshall, Vice President and Treasurer for Southern Union Company, of lawful age, on his oath states that for the period July 1, 2003, through September 30, 2003:

- Panhandle Energy or any direct or indirect subsidiary of Southern Union acquiring or owning any equity interests in Panhandle were owned and operated as a separate subsidiary of Southern Union Company;
- Southern Union Company and MGE did not, directly or indirectly, allow any Panhandle debt to be recourse to them; pledge Southern Union or MGE equity as collateral or security for the debt of any Panhandle entity; give, transfer, invest, contribute or loan to any Panhandle entity, any equities or cash;
- Southern Union did not transfer to Panhandle or any subsidiary thereof, directly or indirectly, assets necessary and useful in providing service to MGE's Missouri customers;
- Southern Union did not, directly or indirectly, enter into any "make-well" agreements, or guarantee the notes, debentures, debt obligations or other securities of any Panhandle entity;
- Southern Union did not adopt indemnify, guarantee or assume responsibility for payment of, either directly or indirectly, any of the current or future liabilities of any Panhandle entity;

that he has knowledge of the matters set forth above; and that such matters are true and correct to the best of his knowledge and belief.

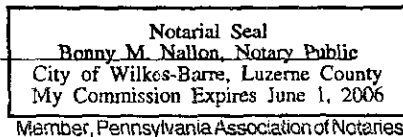
R. N. Marshall

Richard N. Marshall

Subscribed and sworn this 10th day of November, 2003.

Bonny M. Nallon
Notary Public

My Commission expires:



Certificate of Compliance

STATE OF PENNSYLVANIA)
)
COUNTY OF LUZERNE) ss.

Richard N. Marshall, Vice President and Treasurer for Southern Union Company, of lawful age, on his oath states that for the period October 1, 2003, through December 31, 2003:

- Panhandle Energy or any direct or indirect subsidiary of Southern Union acquiring or owning any equity interests in Panhandle were owned and operated as a separate subsidiary of Southern Union Company;
- Southern Union Company and MGE did not, directly or indirectly, allow any Panhandle debt to be recourse to them; pledge Southern Union or MGE equity as collateral or security for the debt of any Panhandle entity; give, transfer, invest, contribute or loan to any Panhandle entity, any equities or cash;
- Southern Union did not transfer to Panhandle or any subsidiary thereof, directly or indirectly, assets necessary and useful in providing service to MGE's Missouri customers;
- Southern Union did not, directly or indirectly, enter into any "make-well" agreements, or guarantee the notes, debentures, debt obligations or other securities of any Panhandle entity;
- Southern Union did not adopt indemnify, guarantee or assume responsibility for payment of, either directly or indirectly, any of the current or future liabilities of any Panhandle entity;

that he has knowledge of the matters set forth above; and that such matters are true and correct to the best of his knowledge and belief.

Richard N. Marshall
Richard N. Marshall

Subscribed and sworn this 3rd day of February, 2004.

Bonny M. Nallon
Notary Public

My Commission expires:

