

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

In the Matter of The Empire District Electric     )  
Company of Joplin, Missouri Tariffs Increasing    )  
Rates for Electric Service Provided in the        )     File No. ER-2012-0345  
Missouri Service Area of the Company            )

**SOUTHERN UNION COMPANY’S STATEMENT OF POSITION**

COMES NOW Southern Union Company, d/b/a Missouri Gas Energy (“MGE”), by and through counsel, and respectfully files its Statement of Position in the above-captioned case. In this regard, MGE states as follows:

1. The Missouri Public Service Commission, in granting a joint request for extension of time, directed the parties to file position statements on February 13, 2013.

2. MGE has not filed testimony in this case, but is participating in this case because it has an interest primarily relating to class cost-of-service, rate design, demand-side management, and rules of service. Like The Empire District Electric Company (“Empire”), MGE sustained significant financial impact and customer losses as the result of the May 22, 2011 tornado that struck Joplin, Missouri. MGE provides natural gas service in a territory which substantially overlaps the territory in which Empire provides electric service, so its intervention in this proceeding was intended to protect its interest as a party that may be affected by a final order in the case.

3. MGE takes no position on the issues set forth in the issue list filed in this matter. MGE reserves the right to assert its position on various issues when evidence is presented during the evidentiary hearings, to file post-hearing briefs, or to otherwise fully participate in further proceedings in this case.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail to all counsel of record this 13<sup>th</sup> day of February 2013.

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Todd J. Jacobs