

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

In the Matter of Missouri Gas Ener-)	
gy and Its Tariff Filing to Imple-)	
ment a General Rate Increase for)	GR-2009-0355
Natural Gas Service)	

**INITIAL BRIEF OF
MIDWEST GAS USERS' ASSOCIATION**

Midwest Gas Users' Association ("Midwest") was interested in selected transportation issues including numerous terms and conditions, balancing methods and charges, service priority and the circumstances under which MGE could invoke an Operational Flow Order or "OFO" on its system.

These issues were encompassed by a Non-unanimous Stipulation and Agreement that was submitted to the Commission on November 5, 2009. The issues that were reserved for litigation in that Settlement were not addressed by Midwest at the hearing.

One of the major issues still confronting the Commission is whether the "Straight Fixed-Variable" residential rate design methodology presently in use should be continued. Midwest took no position on this issue and does not now, except to note, as we did through counsel at the hearing, that the methodology that is described by "SFV" at the federal interstate pipeline level differs from the approach that is so characterized with respect to this LDC.

Given that our issues and concerns were addressed by the November 5, 2009 Non-unanimous Stipulation and Agreement, Midwest would respectfully encourage the Commission to approve that settlement without condition or reservation as being in the public interest.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.

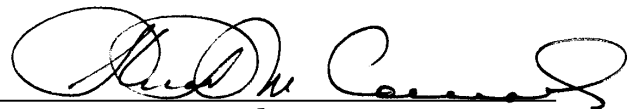


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ATTORNEYS FOR MIDWEST GAS USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as disclosed by the pleadings and orders herein per the Commission's EFIS records.



Stuart W. Conrad

Dated: December 18, 2009