



MISSOURI GAS ENERGY

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ROBERT J. HACK

Vice President, Pricing & Regulatory Affairs

September 1, 2000

FILED

SEP - 5 2000

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102-0360

RE: Case No. GO-2000-705, Missouri Gas Energy

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter, please find an original and eight (8) conformed copies of **Motion To Correct Attachment 1 To Amended Stipulation And Agreement**.

A copy of this filing has been mailed or hand-delivered this date to counsel of record.

Thank you for bringing this matter to the attention of the Commission. Please call me if you have any questions regarding this matter.

Sincerely,

C: F. Jay Cummings
Thomas R. Schwarz, Jr.
Office of the Public Counsel
Ken Hubbard
Mike Langston

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
SEP - 5 2000
Missouri Public
Service Commission

In the matter of Missouri Gas Energy's)
fixed commodity price PGA and)
transportation discount incentive)
mechanism.)

Case No. GO-2000-705

**MOTION TO CORRECT ATTACHMENT 1 TO AMENDED STIPULATION
AND AGREEMENT**

Come now Missouri Gas Energy ("MGE"), a division of Southern Union Company, the Office of the Public Counsel ("Public Counsel") and the Staff of the Missouri Public Service Commission ("Staff") and for this motion to correct Attachment 1 to Amended Stipulation and Agreement respectfully state the following:

1. On May 15, 2000, MGE, the Public Counsel and the Staff submitted an Amended Stipulation and Agreement for the Commission's approval.¹ By order dated August 1, 2000, the Commission approved the Amended Stipulation and Agreement. By order dated August 17, 2000, the compliance tariff sheets were approved to be effective August 31, 2000.

2. In the course of reviewing material pertaining to the Amended Stipulation and Agreement, MGE discovered an error in Attachment 1 of that document. Attachment 1 of the Amended Stipulation and Agreement purports to show the average MGE purchase volumes by month. The MMBtu Volume numbers shown in column (b) of Attachment 1 to the Amended Stipulation and Agreement are correct and add up to the accurate total average MGE purchase volumes as intended by the signatories during negotiations. For reasons unknown, however, the Months shown in column (a) of

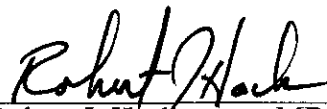
¹ The Amended Stipulation and Agreement replaced the Stipulation and Agreement, signed by representatives of MGE and the Staff, which had been filed on April 28, 2000.

Attachment 1 to the Amended Stipulation and Agreement have been incorrectly presented. Specifically, column (a) of Attachment 1 to the Amended Stipulation and Agreement starts with the month of April and ends with the month of March, while it should correctly start with the month of September and end with the month of August. The correct presentation is shown in Corrected Attachment 1 appended to this pleading. This error materially alters the calculation of the trigger price and is inconsistent with the intent of the parties during negotiations.

3. In order to correct this inadvertent error, MGE, the Staff and the Public Counsel ask that the Commission issue an order adopting Corrected Attachment 1 (appended to this pleading) as the proper method, intended by the signatories, for the calculation of the trigger price under the terms of the Amended Stipulation and Agreement approved by the Commission on August 1, 2000.²

WHEREFORE, the undersigned parties respectfully request that the Commission issue its Order correcting Attachment 1 to the Amended Stipulation and Agreement.

Respectfully submitted,



Robert J. Hack MBE#36496

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ATTORNEY FOR MISSOURI GAS
ENERGY

² This action will not require any tariff modifications because the weighted average NYMEX trigger price calculation is only set forth in the Amended Stipulation and Agreement and is not shown in the compliance tariff sheets.

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ATTORNEY FOR THE STAFF OF
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SERVICE COMMISSION

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ATTORNEY FOR THE OFFICE
OF THE PUBLIC COUNSEL

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was either mailed or hand delivered this 1st day of September, 2000, to:

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Thomas R. Schwarz, Jr.
P.O. Box 360
Jefferson City, Missouri 65102

Robert J. Huch

MISSOURI GAS ENERGY
FIXED COMMODITY PRICE
AVERAGE PURCHASE VOLUMES BY MONTH
NYMEX Trigger Price Calculation

Corrected
Attachment 1

Month (a)	MMBtu Volume (b)	NYMEX As Of Mo/Day/Yr (c)	Weighted \$'s (b) x (c) (d)
September	3,266,893	\$0.000	\$0
October	3,777,761	\$0.000	\$0
November	3,876,584	\$0.000	\$0
December	9,515,251	\$0.000	\$0
January	9,188,394	\$0.000	\$0
February	7,380,092	\$0.000	\$0
March	4,944,132	\$0.000	\$0
April	4,010,252	\$0.000	\$0
May	5,951,650	\$0.000	\$0
June	4,926,916	\$0.000	\$0
July	5,111,039	\$0.000	\$0
August	<u>4,214,049</u>	\$0.000	\$0
Totals	<u>66,163,013</u>		<u>\$0</u>
Annual Weighted Average (MMBtu)			<u>\$0.00</u>
(total weighted \$'s divided by total volumes).			

CORRECTED
ATTACHMENT 1