BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of the application of Southern
Union Company, d/b/a Missouri Gas Energy, for approval to change its infrastructure system Tracking No. YG-2011-0563 replacement surcharge.

MOTION FOR EXPEDITED TREATMENT

COMES NOW Southern Union Company d/b/a Missouri Gas Energy (MGE or Applicant), and, in accordance with Missouri Public Service Commission (Commission) Rules 4 CSR 240-2.080(16) and 4 CSR 240-2.065(2), moves the Commission for expedited treatment of MGE's tariff sheet filed on May 11, 2011:

- On May 11, 2011, the Commission issued its Order Determining ISRS
 Amounts, Rejecting Tariffs, and Directing the Filing of Tariffs. In that Order, the
 Commission rejected the tariff sheet filed by MGE on February 22, 2011 (JG-2011-0433), and authorized MGE to file a tariff to impose an ISRS as specified in the Order.
- 2. Concurrently, with the filing of this Motion, MGE has filed a tariff sheet in order to comply with the Commission Order (Twelfth Revised Sheet No. 10) (provided herewith as **Appendix A**). This tariff sheet carried a proposed effective date of June 10, 2011 (30 days), and was assigned tracking number YG-2011-0563.
- 3. MGE seeks the Commission's order allowing the proposed tariff sheet to go into effect on May 20, 2011, or as soon as it may be acted on by the Commission.
- 4. The ISRS process is authorized by Sections 393.1009, 393.1012 and 393.1015, RSMo, and Commission Rule 4 CSR 240-3.265. Its goal is to provide eligible gas corporations with the ability to recover, on a timely basis, certain infrastructure replacement costs outside of a formal rate case filing via the ISRS. The Commission

has authorized such an ISRS in this case and there are no further procedures to be completed. Granting this Motion will afford MGE the timely rate relief which the Commission has found to be justified. As such, Commission action as requested will be consistent with the public interest as established by the General Assembly and Commission order.

5. The subject tariff sheet and this Motion have been filed as soon as possible after the issuance of the Commission's Order Determining ISRS Amounts, Rejecting Tariffs, and Directing the Filing of Tariffs.

WHEREFORE, for the foregoing reasons, MGE respectfully requests the Commission to grant MGE's Motion for Expedited Treatment and approve MGE's proposed tariff sheet (YG-2011-0563) to be effective on May 20, 2011, or as soon as it may be acted on by the Commission.

Respectfully submitted,

Dean L. Cooper

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ATTORNEYS FOR SOUTHERN UNION COMPANY, d/b/a MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on May 11, 2011, to the following:

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