

MISSOURI GAS ENERGY
A division of Southern Union Company

**Missouri Public Service Commission
DATA INFORMATION REQUEST RESPONSE**

Case Number: GR-2009-0355

Data Request No 0204

Requested From: Mike Noack

Date Requested: 7/13/2009

Information Requested:

In reference to the Company corporate allocation workpapers, please provide the following: A) every position or expense that is allocated based on the "All Entities, Except CCE" weighted average; B) a complete explanation for why these positions or expenses are not allocated to Citrus.

Requested By: Amanda McMellen

Information Provided:

-☐Investor Relations – Payroll and Non-payroll expenses for this cost center are excluded because this function serves only in a capacity that benefits Southern Union.
•☐Vice President, Investor Relations

-☐Communications – Payroll and Non-payroll expenses for this cost center are excluded because Citrus has its own budget for communication expenses
•☐External Affairs Director
•☐Manager, Community Affairs
•☐Corporate Affairs Coordinator
•☐Graphic Designer

-☐Environmental - Payroll and Non-payroll expenses for this cost center are excluded because the Environmental group does a disproportionate amount of work for Citrus than the other wholly owned entities. For this reason, any work that is done for Citrus is directly charged to the Citrus.
•☐Environmental Services Director

-☐Legal - Payroll and Non-payroll expenses for this cost center are excluded because the Legal group does a disproportionate amount of work for Citrus than the other wholly owned entities. For this reason, any work performed by corporate employees for Citrus is direct charged to the Citrus entity. Citrus also has its own legal department.
•☐Senior VP & General Counsel
•☐VP- Business Assessment, Integration & Compliance
•☐VP- Asst Gen Counsel & Corp Secretary
•☐Senior VP Regulatory & Litigation
•☐VP & Assistant General Counsel
•☐Project Manager Corporate Legal Services
•☐Senior Research Legal Analyst
•☐Senior Administrative Assistant
•☐Senior Administrative Assistant
•☐Senior Administrative Assistant
•☐Executive Assistant

The information provided in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to promptly notify the requesting party if, during the pendency of Case No. GR-2009-0355 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

Prepared By: Mike McLaughlin

Date Response Received: _____

Approved by: _____

Director, Pricing and Regulatory Affairs

Date: _____

MISSOURI GAS ENERGY

A division of Southern Union Company

-☐Treasury – Banking fees, rating agency fees, and stock exchange listing fees are excluded from the allocation. El Paso, Southern Unions partner in Citrus, must also pay these fees at their parent company level. For this reason, it would be inequitable for Southern Union to pass these costs to Citrus. Citrus rating agency fees and banking fees are paid by the entity itself.

-☐Accounting – Audit fees by PricewaterhouseCoopers are excluded from the allocation to Citrus. These fees are only for auditing of Southern Union Company. Citrus's audit fees are paid by the entity itself.

-☐Executive – Payroll and Non-payroll expenses for this cost center are excluded because this function serves only in a capacity that benefits Southern Union. El Paso also has an executive cost center that works in a similar capacity to Southern Union's executive management on Citrus-related matters. For this reason, it would be inequitable for Southern Union to pass these costs to Citrus.

•☐Chairman & CEO

•☐President & COO

•☐Accounting Manager

•☐Assistant to Chairman

-☐SUG Air –This is the cost of the fractional Net Jets ownership by Southern Union. The usage is for Southern Union executives conducting company business. El Paso, Southern Unions partner in Citrus, does not charge transportation or jet ownership to Citrus. For this reason, it would be inequitable for Southern Union to pass these costs to Citrus.

A breakdown of payroll and non-payroll dollars can be found in the allocation files that have been previously provided in this proceeding.

The information provided in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to promptly notify the requesting party if, during the pendency of Case No. GR-2009-0355 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

Prepared By: Mike McLaughlin

Date Response Received: _____

Approved by: _____

Director, Pricing and Regulatory Affairs

Date: _____