BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Missouri Gas Energy's Tariffs Increasing Rates for Gas Service Provided to Customers in the Company's Missouri Service Area.

Cases Nos. GR-2006-0422 YG-2006-0845

<u>RECOMMENDATION CONCERNING TEST YEAR</u> AND REQUEST FOR TRUE-UP AUDIT AND HEARING

Comes now Missouri Gas Energy (MGE), a division of Southern Union Company, and, as its recommendation concerning the proper test year and request for true-up audit and hearing, states as follows to the Missouri Public Service Commission (Commission):

1. The Commission's Suspension Order and Notice, dated May 12, 2006, directed

MGE to file by May 24, 2006, a pleading containing any request MGE may have for a true-up audit and hearing.

2. As stated in the Direct Testimony of MGE witness Michael R. Noack (p. 3-4),

MGE recommends that the Commission establish the twelve months ended December 31, 2005, adjusted for known and measurable changes, as the test year for this case.

3. MGE further recommends that the test year be updated through June 30, 2006

(Noack Direct, p. 4). This process would be similar to that used in MGE's last two rate cases and would provide a relatively current time period of actual experience upon which to base rates for the future (*Id.*).

4. Lastly, MGE hereby requests a true-up audit and hearing. MGE requests that the Commission "true-up" the following cost components through October 31, 2006:

RETURN:

Capital Structure and related costs (unless a hypothetical capital structure is adopted)

RATE BASE:

Plant in Service Depreciation Reserve Deferred Taxes Working Capital components including Materials and Supplies, Natural Gas Storage Inventory and Prepaid Expenses

INCOME STATEMENT:

Revenue for Customer Growth Payroll, Employee Levels and Current Wage Levels Pension Costs Injuries and Damages Rate Case Expense Depreciation and Amortization Expense Property Taxes Related Income Tax Effects

MGE suggests that these items represent a package of adjustments designed maintain the

revenue-expense-rate base match at a proper point in time.

WHEREFORE, MGE respectfully requests the Commission adopt the above-described

test year, as adjusted and updated, and true-up for the captioned proceeding.

Respectfully submitted,

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ATTORNEYS FOR MISSOURI GAS ENERGY, A DIVISION OF SOUTHERN UNION COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 24th day of May, 2006, to:

Robert Franson Missouri Public Service Commission Governor's Office Building 200 Madison Street P.O. Box 360 Jefferson City, Missouri 65102 Lewis Mills, Public Counsel Governor's Office Building 200 Madison Street P.O. Box 7800 Jefferson City, Missouri 65102

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Dean L. Cooper