

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

In the Matter of a Working File to)	
Consider Changes to Chapter 13)	File No. AW-2011-0252
Service and Billing Practice Rules.)	

MGE’S COMMENTS

Comes now Southern Union Company d/b/a Missouri Gas Energy (“MGE” or “Company”), by counsel, and provides the following comments to the Missouri Public Service Commission (“Commission”):

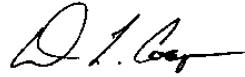
1. On February 10, 2001, the Commission opened this file as a repository for documents and comments related to possible changes to the Commission’s Chapter 13 rules that establish service and billing practice requirements for Missouri’s utilities and solicited informal comments from interested persons and companies.

2. Over the past several years, the Commission’s Staff has been working with various stakeholders to prepare a draft revision of the rules. MGE has been a part of the roundtables and other meetings of the various stakeholders whose purpose has been to reach consensus amongst all parties on those revisions. MGE would like to commend Gay Fred for her leadership of this process and all of the Commission staff who have worked so diligently on bringing these stakeholders together and developing the proposed rule changes.

3. Rather than restating the comments previously submitted by Laclede Gas Company and Union Electric Company d/b/a Ameren Electric, MGE would like to say that it supports and agrees with those comments. MGE also urges the Commission to proceed with the rulemaking and complete the process of revising and updating Chapter 13 rules.

WHEREFORE, MGE respectfully requests the Commission consider these comments and grant such relief as it may find to be reasonable and just.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3rd day of March, 2011, to the following,:

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