

MISSOURI GAS ENERGY
A Division of Southern Union Company

MISSOURI GAS ENERGY
DATA INFORMATION REQUEST
Missouri Rate Case No: GR-2004-0209
Data Request No: 0173

Requested From: Robert Franson

Date Requested: 5/12/04

Information Requested:

Please provide information concerning any communication between current members of the Commission Staff and current members of the Commission regarding rate of return, return on equity and/or capital structure since August 1, 2001, outside the context of a filed rate case. Please also provide copies of any written material provided in connection with said communications and any memorialization of the communications that have taken place, if any. With respect to the materials provided, please identify by whom and to whom the material was provided.

Requested By: Michael R. Noack

Information Provided:

FILED
JUN 02 2004
Missouri Public
Service Commission

Exhibit No. A
Case No(s) GR-2004-0209
Date 5-27-04 Rptr KF

Date Response Received: _____

Signed By: _____

Date: _____

MISSOURI GAS ENERGY
A Division of Southern Union Company

MISSOURI GAS ENERGY
DATA INFORMATION REQUEST
Missouri Rate Case No: GR-2004-0209
Data Request No: 0174

Requested From: Robert Franson

Date Requested: 5/12/04

Information Requested:

Please provide information concerning any communication between current members of the Commission Staff and current members of the Commission regarding depreciation rates, depreciation study and/or the treatment of net salvage/cost of removal since August 1, 2001, outside the context of a filed rate case. Please also provide copies of any written material provided in connection with said communications and any memorialization of the communications that have taken place, if any. With respect to the materials provided, please identify by whom and to whom the material was provided.

Requested By: Michael R. Noack

Information Provided:

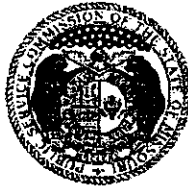
FILED
JUN 02 2004
Missouri Public
Service Commission

Exhibit No. B
Case No(s) GR-2004-0209
Date 5-27-04 Rptr RF

Date Response Received: _____

Signed By: _____

Date: _____



Commissioners

STEVE GAW
Chair

CONNIE MURRAY

ROBERT M. CLAYTON III

JEFF DAVIS

LINWARD "LIN" APPLING

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.mo.gov>

ROBERT J. QUINN, JR.
Executive Director

WESS A. HENDERSON
Director, Utility Operations

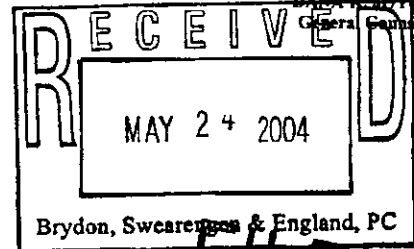
ROBERT SCHALLENBERG
Director, Utility Services

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. BOYCE
General Counsel

May 21, 2004

Paul Boudreau
Brydon, Swearingen & England
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456



JUN 02 2004

Missouri Public
Service Commission

Re: Case No. GR-2004-0209
Staff Objections to MGE DRs 173 and 174

Dear Paul:

This letter is in regard to Data Requests (DRs) 173 and 174 received by Staff on May 12, 2004.

Staff objects to DR No. 173. This DR seeks information regarding whether any current member of the Staff had any conversations with any current Commissioner regarding rate of return, return on equity and/or capital structure since August 1, 2001. Staff objects to this DR as irrelevant in that it is not likely or intended to lead to the discovery of admissible evidence. Furthermore this DR is unduly burdensome and Staff objects on this basis also. In order to answer this DR, Staff would be required to poll current Commissioners and to poll current employees. Any contact with current Commissioners would clearly be inappropriate as ex parte contact.

Staff objects to DR No. 174. This DR seeks information regarding whether any current member of the Staff, had any conversations with any current Commissioner or any individual Commissioner regarding depreciation, depreciation studies and/or the treatment of net salvage, cost of removal since August 1, 2001. Staff objects to this DR as irrelevant in that it is not likely or intended to lead to the discovery of admissible evidence. Furthermore, this DR is unduly burdensome and Staff objects on this basis also. In order to answer this DR, Staff would be required to poll current Commissioners and to poll current employees. Any contact with current Commissioners would clearly be inappropriate as ex parte contact.

Exhibit No. C
Case No(s) GR-2004-0209
Date 5-27-04 Rptr XF

Informed Consumers, Quality Utility Services, and a Dedicated Organization for Missourians in the 21st Century

ATTACHMENT 3

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Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

/s/ Robert V. Franson

Robert V. Franson
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573-751-9285 (facsimile)
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