

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

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment (PGA) Factors) Case No. GR-2005-0104
To be Audited in Its 2003-2004 Actual Cost)
Adjustment.)

RESPONSE TO ORDER DIRECTING RESPONSE

COMES NOW Enbridge Pipelines (KPC) (hereafter “KPC”), through the undersigned counsel, and for its Response to Order Directing Response respectfully states as follows:

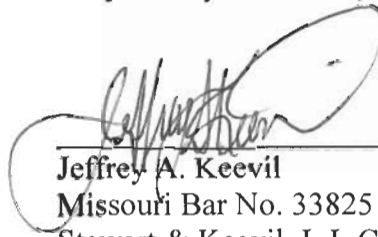
1. As the Commission is aware, in Case No. GR-2003-0330 (consolidated with Case No. GR-2002-348), the Commission “bifurcated” what it referred to as “the Kansas Pipeline issue” which was pending before the Missouri Supreme Court, and held that issue in abeyance recognizing that it could not move forward on that issue. A procedural schedule was then established for the non-Kansas Pipeline issues; some of the scheduled procedural events relating to those non-Kansas Pipeline issues have now occurred, while others have not.

2. In this case, Case No. GR-2005-0104, Staff continues to raise the Kansas Pipeline issue. However, as the Commission is also aware, the issue is once again pending before the Missouri Supreme Court.

3. KPC takes no position on the question of whether this case, Case No. GR-2005-0104, should be consolidated with Case No. GR-2003-0330, as long as the Kansas Pipeline issue(s) continues to be bifurcated out from the other issues in the consolidated

case(s), held in abeyance and addressed separately, pursuant to a separate procedural schedule. If the Commission wishes to set a procedural schedule in the case(s), KPC believes that a schedule can only be set for the non-Kansas Pipeline issues and that the Kansas Pipeline issue(s) must continue to be bifurcated from the other issues in the case(s), held in abeyance and addressed separately, pursuant to a separate procedural schedule to be set at a later date, whether or not Case No. GR-2005-0104 and Case No. GR-2003-0330 are consolidated.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail postage paid, by hand-delivery, or by electronic transmission to counsel for parties of record on this 28th day of March, 2006.

