

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

The Staff of the Missouri Public Service Commission,)	
Complainant,)	
)	
v.)	Case No. GC-2011-0100
)	
Missouri Gas Energy, a Division of Southern Union Company,)	
Respondent.)	

RESPONSE OF SOUTHERN UNION COMPANY

COMES NOW Southern Union Company d/b/a Missouri Gas Energy (“MGE”) and for its Response to the Order Directing Southern Union Company to Explain Why it Has Not Complied with a Commission Order, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. On May 1, 2013, the Commission issued its Order to File New Tariff Sheets which directed MGE to file new tariff sheets by May 20, 2013 related to the order of the Western District Court of Appeals in Public Service Commission v. Missouri Gas Energy, 388 S.W. 3d 221 (Mo. App. W.D. 2012).

2. The revised tariff sheets were not filed by MGE on May 20th and the Commission issued its order on June 3rd seeking an explanation by June 10th.

3. Revised tariff sheets have been submitted to the Commission today, June 4th, concurrently with the filing of this explanation.

4. The omission was completely inadvertent, as undersigned counsel overlooked the Commission’s May 1st order in the press of other matters and emails while out of town on business on that same date. Undersigned counsel apologizes to the

Commission for this oversight, has communicated an apology to Staff counsel, and left a similar voice message for the Office of Public Counsel attorney.

5. In that the Company's delay in filing revised tariff sheets may have caused a potential delay in the effective date of any tariffs approved by the Commission (assuming that no other party objects to the revised tariffs), the Company waives any objection it might have to a Commission decision to expedite the effective date of its revised tariff sheets.

WHEREFORE, MGE respectfully replies to the Commission's order.

Respectfully submitted,

/s/ **Todd J. Jacobs**

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ATTORNEY FOR SOUTHERN UNION COMPANY
d/b/a MISSOURI GAS ENERGY

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail on this 4th day of June 2013 to counsel of record.

/s/

Todd J. Jacobs