

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

In the Matter of )  
Kansas City Power & Light Company’s )  
Request for Authority to Implement ) File No. ER-2012-0174  
A General Rate Increase for Electric Service )

In the Matter of )  
KCPL Greater Missouri Operations Company’s )  
Request for Authority to Implement ) File No. ER-2012-0175  
General Rate Increase for Electric Service )

**MGE’S CONTINGENT STATEMENT OF NON-OPPOSITION**

COMES NOW Southern Union Company d/b/a Missouri Gas Energy (“MGE”), by and through counsel, and, for its Contingent Statement of Non-Opposition, states as follows to the Missouri Public Service Commission (“Commission”):

1. On October 29, 2012, certain parties filed a Non-Unanimous Stipulation and Agreement Regarding Class Cost of Service/Rate Design in Case No. ER-2012-0174, and a Non-Unanimous Stipulation and Agreement Regarding Class Cost of Service/Rate Design in Case No. ER-2012-0175.

2. The stipulations contained provisions related to class revenue shifts and how any overall increase would be applied to the base rate revenues of each class, among other things.

3. The rate design issues taken to hearing in which MGE is interested concern “intra-class” shifts within the residential customer class and the assignment of any increase to the various rates within the residential class.

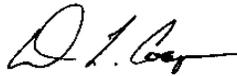
4. The Stipulations appear to define “class” as “residential, small general service, medium general service, large general service and large power service” in Case No. ER-2012-0174, and as “residential, small general service, large general service and large power service” in

Case No. ER-2012-0175. It is MGE's understanding that the use of the word "class" throughout the stipulations has these same meanings and, thus, the stipulations have no impact on the issues in which MGE is interested (KCPL Issues I.6.d, I.6.f and I.6.g and all pending GMO issues regarding residential rate design, including Issues III.7.d "Residential Rate Adjustment," and III.7.a- [sec] "Residential Space Heating Services").

5. Contingent upon this understanding, MGE does not oppose the stipulations.

WHEREFORE, MGE respectfully requests that the Commission consider this Contingent Statement of Non-Opposition and, thereafter, issue such orders as it should find to be just and reasonable.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI GAS ENERGY

## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 1<sup>st</sup> day of November, 2012, to:

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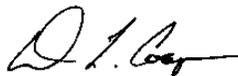
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