

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

In the matter of the application of Missouri Gas )  
Energy, a division of Southern Union Company, for )  
a certificate of public convenience and necessity )  
authorizing it to construct, install, own, operate, )  
control, manage and maintain a natural gas )  
distribution system to provide gas service in )  
Platte County, Missouri, as an expansion of its )  
existing certified area. )

Case No. GA-2007-\_\_\_\_\_

**APPLICATION**

COMES NOW Missouri Gas Energy, a division of Southern Union Company ("MGE" or "Applicant"), by and through its counsel, and as its Application pursuant to §393.170, RSMo (2000), 4 CSR 240-2.060 and 4 CSR 240-3.205 for a certificate of public convenience and necessity, respectfully states as follows:

1. Applicant is Missouri Gas Energy, a division of Southern Union Company. MGE's principal office is located at 3420 Broadway, Kansas City, Missouri 64111.
2. Southern Union Company is a corporation duly incorporated under the laws of the State of Delaware and conducts business in Missouri under the fictitious name of Missouri Gas Energy. A copy of a certificate from the Missouri Secretary of State that Southern Union Company is authorized to do business in Missouri as a foreign corporation was submitted in Case No. GA-2001-509 and is incorporated by reference. A copy of a certificate from the Missouri Secretary of State that Missouri Gas Energy is a registered fictitious name of Southern Union Company was submitted in Case No. GA-2001-509 and is incorporated herein by reference. Other than cases that have been docketed at the Commission, MGE has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court within the past three (3) years that involve customer service or rates. MGE has no annual report or assessment fees that are overdue.

3. MGE conducts the business of a “gas corporation” and provides natural gas service in the Missouri counties of Andrew, Barry, Barton, Bates, Buchanan, Carroll, Cass, Cedar, Christian, Clay, Clinton, Cooper, Dade, Dekalb, Greene, Henry, Howard, Jackson, Jasper, Johnson, Lafayette, Lawrence, McDonald, Moniteau, Cedar, Pettis, Platte, Ray, Saline, Stone, and Vernon, subject to the jurisdiction of the Missouri Public Service Commission (Commission).

4. All correspondence, communications, notices, orders and decisions of the Commission with respect to this matter should be sent to the undersigned counsel and:

Michael R. Noack  
Director, Pricing & Regulatory Affairs  
Missouri Gas Energy  
3420 Broadway  
Kansas City, Missouri 64111  
Telephone: (816) 360-5560  
Facsimile: (816) 360-5536  
Email: mike.noack@sug.com

5. Developers have requested that MGE provide natural gas service to three (3) new residential subdivisions and two commercial buildings. The new homes are to be located within Sections 13 and 14, Township 52 North, Range 35 West in Platte County. This is an area where MGE currently does not hold a certificate for natural gas service from the Commission.

6. Attached hereto and marked as **Appendix A** is a map of the location of the proposed service area that is Sections 13 and 14, Township 52 North, Range 35 West in Platte County, Missouri. MGE already has a certificate from the Commission to serve adjacent sections 11 and 12 in that same Township and Range and adjacent section 18 in Township 52 North, Range 34 West, in addition to numerous other sections in Platte County.

7. Attached hereto and marked as **Appendix B** is a metes and bounds legal description of the proposed boundaries of the certificated area in Greene County, consisting of one (2) section.

8. Attached hereto and marked as **Appendix C** is an estimate of the cost of

construction and the estimated annual margin to be received from the proposed customers in the development. The overall net cost of the project will be paid for by customer supplied funds and no external financing for construction related to this area will be necessary. Construction methods will follow MGE's customary standards and the rules of the Commission.

9. Attached hereto and marked as **Appendix D** is a list of twelve persons residing in or who are landowners within the proposed service area.

10. Because MGE does not have a certificate from the Commission for the area where the potential customers are located, it is necessary for MGE to obtain the requisite permission from the Commission.

11. Applicant will not require any franchises or permits from municipalities, counties, or other authorities in connection with the proposed construction other than the usual and customary state highway, railroad and county road permits which will be obtained prior to construction.

12. Applicant's existing rates and regulations for natural gas service contained in its tariff, as the same may change from time to time pursuant to law, will apply to service in the proposed area.

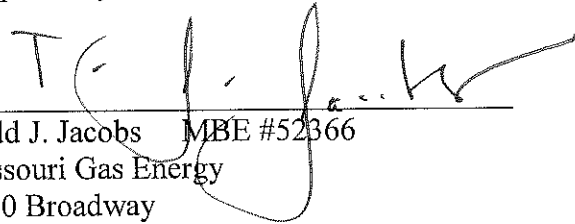
13. The area in which MGE is seeking to be certificated hereby is expected to develop and require natural gas service. Service from a natural gas supplier is not available in this area at the present time. Since MGE has the franchise and the ability to provide service in this area by construction of additions to existing facilities, MGE believes that potential new customers should be afforded the opportunity to take service from MGE if they so desire, pursuant to MGE's extension rule. These facts support a finding that the granting of the application is required by the public convenience and necessity.

14. No gas transmission lines are required to be constructed as a part of this application.

WHEREFORE, Applicant requests an order from the Commission granting it a certificate of convenience and necessity to construct, install, own, operate, control, manage, and maintain a

system for the provision of natural gas service to the public pursuant to its approved rates, rules and regulations, in Sections 13 and 14, Township 52 North, Range 35 West in Platte County, Missouri.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. J. Jacobs', is written over a horizontal line.

Todd J. Jacobs MBE #52366  
Missouri Gas Energy  
3420 Broadway  
Kansas City, Missouri 64111  
Telephone: (816) 360-5976  
Facsimile: (816) 360-5903  
Email: todd.jacobs@sug.com

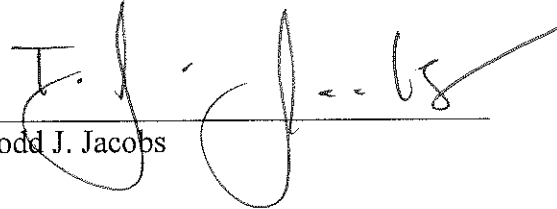
Attorney for Missouri Gas Energy

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, on the following counsel this \_\_\_\_ day of January, 2007:

Office of the General Counsel  
Missouri Public Service Commission  
Governor State Office Building  
Jefferson City, Missouri 65101

Office of the Public Counsel  
Governor State Office Building  
Jefferson City, Missouri 65101

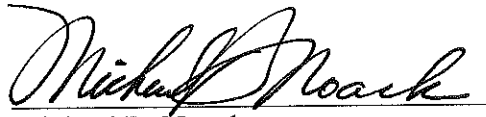
  
\_\_\_\_\_  
Todd J. Jacobs

AFFIDAVIT

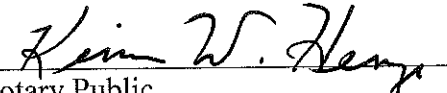
STATE OF MISSOURI  
COUNTY OF JACKSON

)  
) ss  
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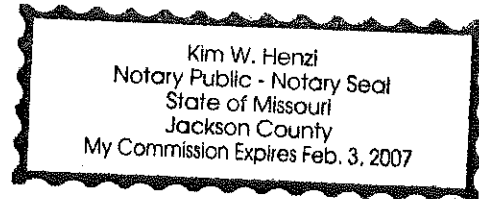
I, Michael R. Noack, having been duly sworn upon my oath, state that I am the Director of Pricing and Regulatory Affairs for Missouri Gas Energy, that I am duly authorized to make this affidavit on behalf of Missouri Gas Energy, and that the matters and things stated in the foregoing application and appendices thereto are true and correct to the best of my information, knowledge and belief.

  
Michael R. Noack

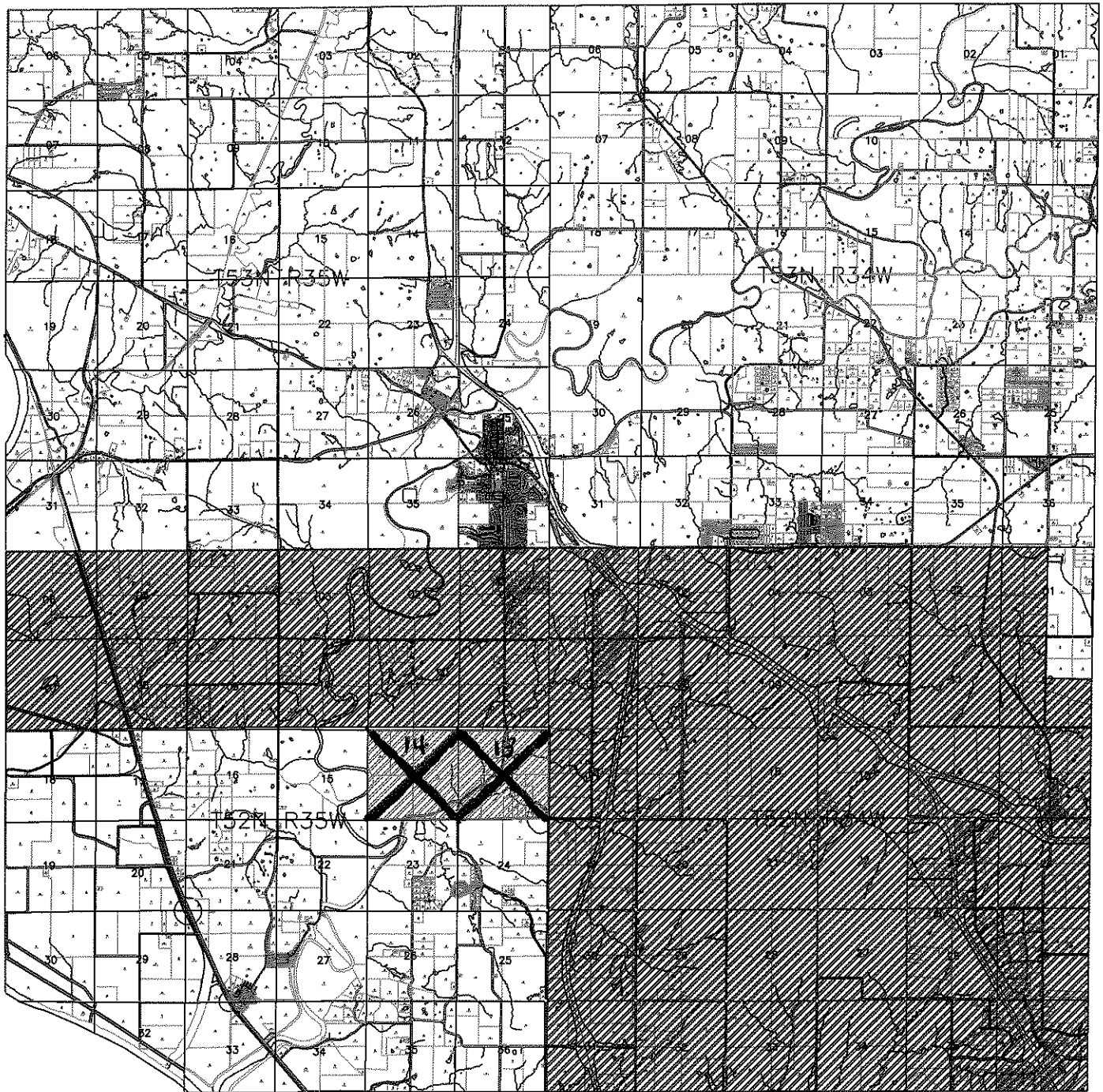
Subscribed and sworn to before me this 31<sup>st</sup> day of January 2007.



  
Notary Public

My Commission expires: Feb 3, 2007



PLATTE COUNTY, MISSOURI



 EXISTING CERTIFICATION AREA  
 PROPOSED CERTIFICATION AREA

DIV. 12, TOWN 61

DATE		1		MISSOURI GAS ENERGY		ENGINEERING DEPARTMENT	
BY		DATE		PLATTE COUNTY, MO		TOWN 61	
DESCRIPTION		DATE		NEW CERTIFICATION AREA		SECTION 13 & 14	
A. HARRIS		A. HARRIS		R.T.S.		8794	
1/25/87		R.T.S.		8794		1 OF 1	

**Appendix B**

MISSOURI GAS ENERGY  
APPLICATION FOR CERTIFICATE OF CONVENIENCE AND NECESSITY  
Metes And Bounds

COUNTY	TOWNSHIP & RANGE		SECTIONS
PLATTE	T 52 N	R 35 W	SEC 13, 14



### 3 Year Construction Estimate for Platte City certification area

### Appendix C

Project	W.O.	Footage	No. Meters	Work Order Cost	Contract Cost	Est. Usage (ccf/yr)	Est. Usage per Meter	Margin/meter	Est. Annual Margin
Seven Bridges Phases 1 & 2	05-8584	19,479	211	\$160,151.06	\$125,825.00	105,500	500	206	\$43,423.80
Seven Bridges Phases 3 & 4	pending	7,667	105	n/a	\$55,585.75	52,500	500	206	\$21,609.00
Copper Ridge Phase 1	06-0580	3,631	46	\$22,042.94	\$26,324.75	23,000	500	206	\$9,466.80
Lakes at Oakmont Phase 8	06-1199	1,365	23	\$9,298.80	\$9,896.25	11,500	500	206	\$4,733.40
Commercial Building #1	pending	n/a	1	\$2,500.00	n/a	6,000	6,000	930	\$930.00
Commercial Building #2	pending	n/a	1	\$2,500.00	n/a	6,000	6,000	930	\$930.00
		32,142	387	\$196,492.80	\$217,631.75	204,500			\$81,093.00
Est. Usage based on heat pump with gas back up, gas water and one gas fireplace									
Commercial buildings are based on est. usage of over 6,000 ccf annually									

## Appendix D

### 12 Addresses/Landowners residing in proposed service area

Count	Owner	Address	City	State	Zip
1	William A and Jo Karen Brown	14850 NW Bethel Rd	Platte City	MO	64079
2	C Dane and Joyce Hisel	16755 NW 138th Ct	Platte City	MO	64079
3	Wilber A Hedrick & Lorene P Rose	16750 NW 137th Ct	Platte City	MO	64079
4	Our Savior Evangelical Lutheran Church	14155 Highway N	Platte City	MO	64079
5	Janet S VanWinkle and Jimmy D Aughinbaugh	13595 N Farley Rd	Platte City	MO	64079
6	Sharon M Forshay	13955 N Farley Rd	Platte City	MO	64079
7	Tommy M and Joanne C Renz	1700 4th St	Platte City	MO	64079
8	Michael E and Susan Chieppo	13435 N Farley Rd	Platte City	MO	64079
9	Mark J and Lisa A Huber	13545 N Farley Rd	Platte City	MO	64079
10	John W Jr and Carole C Coots	2104 4th St	Platte City	MO	64079
11	Larry J and Janet S Newman	125 Broken Bridge Ln	Platte City	MO	64079
12	Neil W and Teresa T Davis	PO Box 13	Platte City	MO	64079