

Exhibit No.:
Issues: Tariff Issues
Witness: Lesa A. Jenkins
Sponsoring Party: MO PSC Staff
Type of Exhibit: Supplemental Rebuttal
Testimony
Case No.: GT-2010-0261
Date Testimony Prepared: June 22, 2010

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY SERVICES DIVISION

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

LESA A. JENKINS

MISSOURI GAS ENERGY

CASE NO. GT-2010-0261

*Jefferson City, Missouri
June 2010*

1 **SUPPLEMENTAL REBUTTAL TESTIMONY**

2 **OF**

3 **LESA A. JENKINS**

4 **MISSOURI GAS ENERGY**

5 **CASE NO. GT-2010-0261**

6 Q. Please state your name and business address.

7 A. Lesa A. Jenkins, P.O. Box 360, Jefferson City, MO 65102.

8 Q. Are you the same witness who submitted information in the
9 Staff's Supplemental Direct Testimony addressing Missouri Gas Energy's
10 (MGE or Company) transportation tariff issues in this case?

11 A. Yes.

12 Q. What is the purpose of your Supplemental Rebuttal testimony?

13 A. I will respond to the Supplemental Direct Testimonies of Richard Haubensak,
14 Constellation NewEnergy-Gas Division, LLC (Constellation), and David N. Kirkland, MGE.

15 Q. Does Staff oppose lowering the transportation threshold to 30,000 Ccf/year
16 (Haubensak Supplemental Direct, page 6, lines 3-7)?

17 A. No. Mr. Haubensak supports a lowered threshold of 30,000 Ccf per year to
18 qualify to participate as a transport customer (Haubensak Supplemental Direct, page 3,
19 lines 1-2). As noted in the Supplemental Rebuttal Testimony of Staff witness
20 Michael J. Ensrud, Staff does not oppose the proposal to lower the threshold for eligibility for
21 taking service in the Transport Class, allowing more customers to seek that status.

22 However, Mr. Haubensak differentiates between small volume and large volume
23 transport customers (Haubensak Supplemental Direct, pages 10-11). Mr. Haubensak requests

1 that telemetry not be required for small volume transportation customers whose peak month
2 usage is less than 15,000 Ccf. (Haubensak Supplemental Direct, page 3, lines 2-4).

3 Q. How many customers would qualify as small transport using Mr. Haubensak's
4 definition of a small transport customer?

5 A. Of current Large General Service (LGS) sales customer accounts, 20% would
6 qualify as transport customers. Although this is 20% of the number of LGS accounts, it is
7 44% of the LGS annual volumes. Of these potential LGS transport customers, 87% would
8 qualify as small transport customers which amounts to 74% of the annual volumes for those
9 that would qualify as LGS transport customers. Thus, using Mr. Haubensak's proposed
10 definition, the small transport customers make up a large percentage of the overall customers
11 qualifying as LGS transport customers.

12 Q. Does Staff recommend that customers taking service under a potential lowered
13 usage threshold be exempted from MGE's telemetry requirements?

14 A. No. As addressed in the Supplemental Direct and Supplemental Rebuttal
15 testimony of Staff witness Michael J. Ensrud, Staff supports MGE's telemetry requirement for
16 all transport customers.

17 Q. What issues do you have with the testimony of Mr. Kirkland, MGE?

18 A. Regarding the potential for stranded cost of transportation capacity, MGE
19 proposes that LGS customers switching from sales to transportation service be required to
20 "accept a pro-rata release of the Company's pro-rata share of the applicable interstate
21 pipeline's firm capacity, excluding storage capacity. This pro-rata share would be based on
22 the customer's peak month demand volume..." (Kirkland Supplemental Direct, page 8,
23 lines 3-8). In principle Staff agrees the LGS transport customer should be paying for the

Supplemental Rebuttal Testimony
of Lesa A. Jenkins

1 pro-rata share of the capacity that was purchased to serve them when they were sales
2 customers so that the remaining sales customers are not stranded with any of those costs.
3 Staff is still reviewing the details of MGE's proposal and responses to
4 Staff Data Request No. 3 and Constellation Data Request No. 3 which add details to
5 the calculation. Staff continues to have discussions with MGE to clarify the numbers and
6 calculations in the spreadsheet included in the response to Constellation Data Request No. 3.

7 Q. Does this conclude your Supplemental Rebuttal Testimony?

8 A Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In re Missouri Gas Energy's Revised)
Transportation Tariff)

Case No. GT-2010-0261

AFFIDAVIT OF LESA A. JENKINS

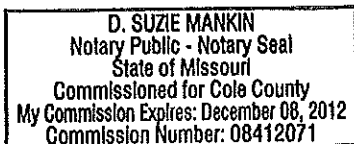
STATE OF MISSOURI)
)
COUNTY OF COLE) ss.

Lesa A. Jenkins, of lawful age, on her oath states: that she has participated in the preparation of the foregoing Supplemental Rebuttal Testimony in question and answer form, consisting of 3 pages to be presented in the above case; that the answers in the foregoing Supplemental Rebuttal Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true and correct to the best of her knowledge and belief.



Lesa A. Jenkins

Subscribed and sworn to before me this 22nd day of June, 2010.





Notary Public