

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

In the Matter of the Application of	)	
Missouri Gas Energy for the Issuance of an	)	
Accounting Authority Order Relating to its	)	File No. GU-2011-0392
Natural Gas Operations and for a	)	
Contingent Waiver of the Notice	)	
Requirement of 4 CSR 240-4.020(2)	)	

**REQUEST TO RESPOND**

**COMES NOW** Southern Union Company, d/b/a Missouri Gas Energy (MGE) and respectfully states as follows to the Missouri Public Service Commission (Commission):

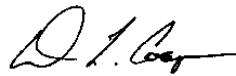
1. On June 10, 2011, MGE filed an Application for Issuance of an Accounting Authority Relating to its Natural Gas Operations in the Joplin Missouri area.
2. By Order dated July 22, 2011, the Commission directed that the Staff file either a recommendation concerning the application or a report on the status of its investigation by August 19, 2011.
3. On August 19, 2011, the Staff filed a document entitled Staff Recommendation to Approve MGE's Application in Part and Deny in Part. As suggested by the name, Staff did not recommend approval of the MGE application in total.
4. This matter was listed on the Commission agenda notice published today for an "Order Denying Application in Part and Approving Application in Part Subject to Conditions." Presumably, the described order is to be considered at the September 13, 2011 Commission agenda meeting.
5. Because the Staff Recommendation is not consistent with MGE's Application, Counsel had anticipated an order setting a response date such as was recently issued in a

similarly postured matter (*See* File No. EU-2011-0387 – Order Establishing a Response Deadline – August 30, 2011).

6. Given the position taken by the Staff, MGE hereby requests the opportunity to respond to the Staff Recommendation prior to the Commission's consideration of the referenced order. If granted that opportunity, MGE would be prepared to respond to the Staff Recommendation by September 16, 2011.

**WHEREFORE**, MGE respectfully requests that the Commission consider this request and, thereafter, issue such orders as it should believe reasonable and just.

Respectfully submitted,



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Dean L. Cooper                      MBE #36592  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 E. Capitol Avenue  
P. O. Box 456  
Jefferson City, MO 65102  
Phone: (573) 635-7166  
Fax: (573) 634-3847  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

Todd J. Jacobs                      MBE #52366  
Senior Attorney  
[Missouri Gas Energy](http://MissouriGasEnergy.com)  
3420 Broadway  
Kansas City, MO 64111  
816-360-5976  
816-360-5903 (fax)  
[Todd.Jacobs@sug.com](mailto:Todd.Jacobs@sug.com)

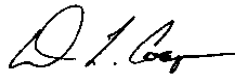
ATTORNEYS FOR MISSOURI GAS ENERGY

### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 12<sup>th</sup> day of September, 2011, to the following:

Lera Shemwell  
Missouri Public Service Commission  
[lera.shemwell@psc.mo.gov](mailto:lera.shemwell@psc.mo.gov)

Marc Poston  
Office of the Public Counsel  
[marc.poston@ded.mo.gov](mailto:marc.poston@ded.mo.gov)



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