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June 27, 2001

FILED²
JUN 27 2001
Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Executive Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

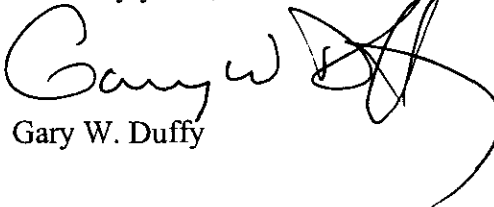
RE: Case No. GC-2001-593
TXU Energy Services, Inc. and Schreiber Foods, Inc. vs. MGE

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding on behalf of MGE please find an original and eight copies of the MGE's Response to Motion to Strike.

If you have any questions, please give me a call.

Sincerely yours,


Gary W. Duffy

Enclosures
cc w/encl:

Don Otto
Office of Public Counsel
Office of the General Counsel
Rob Hack
John Lassman

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
JUN 27 2001
Missouri Public
Service Commission

TXU Energy Services, Inc., and)
Schreiber Foods, Inc.)
Complainants,)
v.)
Missouri Gas Energy, a Division of)
Southern Union Company,)
Respondent.)

Case No. GC-2001-593

RESPONSE TO MOTION TO STRIKE

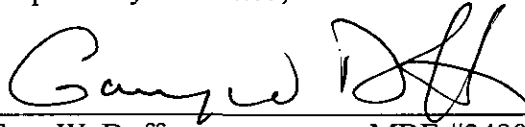
COMES NOW Respondent Missouri Gas Energy, and for its response to "Complainants' Reply to Answer" filed on June 27, 2001, and respectfully states as follows:

1. Although it was not denominated as a motion, "Complainants' Reply to Answer" filed on June 27, 2001, contains the statement "Complainants move that said paragraphs be stricken." The motion to strike presumably refers to the "Explanation" section of Respondent's Answer.

2. The Complainants' motion to strike should be denied. The Explanation section of Respondent's Answer does contain material in the nature of affirmative defenses and factual allegations. Further, the test found in Civil Rule 55.27(c) for whether something in a pleading should be stricken is whether it is an "insufficient defense or any redundant, immaterial, impertinent, or scandalous matter." Complainants have not alleged that anything in the Explanation section of Respondent's Answer qualifies as such.

WHEREFORE, MGE requests that the Commission overrule the Complainants' motion to strike.

Respectfully submitted,



Gary W. Duffy MBE #24905
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ATTORNEYS FOR
MISSOURI GAS ENERGY, A DIVISION OF
SOUTHERN UNION COMPANY

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed by deposit with the United States Postal Service, first class postage prepaid, or hand delivered this 27th day of June, 2001, to:

Donald C. Otto, Jr.
Attorney at Law
901 Missouri Boulevard #163
Jefferson City, Missouri 65101

Office of the General Counsel
Missouri Public Service Commission
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Jefferson City, Missouri

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Gary W. Duffy