A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST Missouri Rate Case No: GR-2004-0209

Data Request No: 0016

Requested From:

Deborah Bernsen

Date Requested:

4/22/04

## Information Requested:

Please provide information in the Staff's possession on the abandoned call rate ("ACR"), average speed of answer ("ASA"), customer complaint levels, percent of appointments kept, estimated meter reads, and average response time to Commission-forwarded complaints of natural gas local distribution companies operating in the state of Missouri (other than MGE) for the time period beginning January 1, 2001 and thereafter.

Requested By: Michael R. Noack

Date Response Received:	Signed By:	
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A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST Missouri Rate Case No: GR-2004-0209

Data Request No: 0017

Requested From: Deborah Bernsen

Date Requested: 4/22/04

## Information Requested:

Please provide information in the Staff's possession on percent of appointments kept and average response time to Commission-forwarded complaints of electric utilities and water utilities operating in the state of Missouri for the time period beginning January 1, 2001 and thereafter.

Requested By: Michael R. Noack

Date Response Received:	Signed By:	
	Date:	

A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST Missouri Rate Case No: GR-2004-0209

Data Request No: 0020

Requested From:	Dana Eaves

4/22/04

## Information Requested:

Date Requested:

Please provide any analysis, and all supporting information and material upon which the analysis is based, used by the Staff to calculate a billing lag of 3.1736 for Laclede Gas Company in Case No. GR-2002-356 (as discussed on page 8 of witness Eaves' direct testimony).

Requested By: Michael R. Noack

Date Response Received:	Signed By:
	Date:

A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST Missouri Rate Case No: GR-2004-0209

Data Request No: 0023

Requested From: Dana Eaves

Date Requested: 4/22/04

## Information Requested:

Does witness Eaves know how MGE's number of monthly estimated bills compares to other Missouri natural gas local distribution companies? If so, please describe the extent of that knowledge.

Requested By: Michael R. Noack

Date Response Received:	Signed By:
	Date:

A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST

Missouri Rate Case No: GR-2004-0209
Data Request No: 0038

Requested From:

Mark Oligschlaeger

Date Requested:

4/22/04

# Information Requested:

In reference to pages 8 and 9 of witness Oligschlaeger's direct testimony, please provide information in the Staff's possession showing the billing lags calculated by the Staff of the Missouri Public Service Commission for large energy utilities in the state of Missouri since January 1, 2001. Response to this data request should not be limited to simply a listing of billing lags, but should also include any analysis used to develop the resulting billing lags and any and all information and material used in the analysis.

Requested By: Michael R. Noack

Date Response Received:	Signed By:
	Date:

A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST Missouri Rate Case No: GR-2004-0209

Data Request No: 0042

**Requested From:** Jolie Mathis

Date Requested: 4/22/04

# Information Requested:

Please describe, and provide a copy of, the analysis undertaken by Staff witness Adam regarding average service lives for MGE in Case No. GR-2001-292 (as discussed on pages 3 and 4 of witness Mathis' direct testimony), including the identity of the company or companies used in the analysis. Appropriate response to this data request should also provide all material and information used by witness Adam in conducting the analysis, including workpapers developed by Mr. Adam, and underlying property records, accounting and financial information of the company or companies involved in the analysis.

Requested By: Michael R. Noack

Date Response Received:	Signed By:
	Date:

A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST Missouri Rate Case No: GR-2004-0209

Data Request No: 0044

Requested From:

Jolie Mathis

Date Requested:

4/22/04

## Information Requested:

Please provide information in the Staff's possession regarding the Commission-authorized depreciation rates of other natural gas local distribution companies operating in the state of Missouri, including: authorized depreciation rates (by company, by account); parameters used for those depreciation rates such as average service lives (by account, by company); plant balances as of December 31, 2003, or as current as the Staff possesses (by company, by account); composite depreciation rates (by company); reserve balances as of December 31, 2003, or as current as the Staff possesses (by company, by account); and treatment of cost of removal/salvage (e.g., as an expense item or as a component of the authorized depreciation rate).

Requested By: Michael R. Noack

Date Response Received:	Signed By:	
	Date:	

A Division of Southern Union Company

# MISSOURI GAS ENERGY DATA INFORMATION REQUEST Missouri Rate Case No: GR-2004-0209

Data Request No: 0045

Requested From:

Jolie Mathis

Date Requested:

4/22/04

## Information Requested:

Please provide summary information in the possession of the Commission Staff regarding Laclede Gas Company's safety line replacement program since 1990, including the number of various service facilities (e.g., service lines, mains, etc.) replaced, by type category (e.g., unprotected steel, bare steel, cast iron, copper, etc.), by unit (e.g., number of service lines, feet or mile of main, etc) and by year. If this is publicly available information, please indicate where it can be found.

Requested By: Michael R. Noack

Date Response Received:	Signed By:	
	Date:	