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May 1, 2001

FEDERAL EXPRESS

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

FILED

MAY 2 2001

Missouri Public
Service Commission

Re: **Missouri Gas Energy**
Case No. GR-2001-292

Dear Mr. Roberts:

Enclosed is the original and eight (8) conformed copies of **Motion of Midwest Gas Users' Association for Leave to File Supplemental Direct Testimony**, which please file and call to the attention of appropriate Commission personnel.

An additional copy of the material to be filed is enclosed, which kindly mark as received and return to me in the enclosed envelope as proof of filing.

Thank you for your attention to this important matter. If you have any questions, please call.

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 
Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

MAY 2 2001

Missouri Public
Service Commission

In the matter of Missouri Gas Ener-)
gy of Kansas City, Missouri re-)
quested authority to file a tariff)
reflecting a change in rates for)
its Missouri customers)

Case No. GR-2001-292

MOTION OF MIDWEST GAS USERS' ASSOCIATION
FOR LEAVE TO FILE
SUPPLEMENTAL DIRECT TESTIMONY

Intervenor Midwest Gas Users' Association ("Midwest")
moves for leave to file the Supplemental Direct Testimony of
Charles D. Laderoute and in support states:

1. Midwest timely filed the Direct Testimony of
Charles D. Laderoute on April 26, 2001.
2. At that time, several responses to data requests
were outstanding from Missouri Gas Energy, which responses were
received on the following Friday and Saturday after April 26,
2001.
3. In his Direct Testimony, Mr. Laderoute made
reference to these outstanding data request responses and stated
that at the time his Direct Testimony was filed,

there were many Data Requests outstanding
that I assisted in preparing. Numerous other
responses, though provided in a reasonable
time after the request from MGE, have not
been reviewed adequately to serve as input to
my COSS. In several cases regarding impor-
tant pieces of data, there are outstanding
follow-up questions. The Responses to these
could change certain of the results, and at
least regarding two items the impact could be
non-trivial. I would therefore like to re-

serve the right to update my findings to the extent that data becomes available for input into my model.

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At this point we have outstanding clarification requests to MGE regarding this data. When we get that clarification, I intend to specifically assign actual costs for at least Meters and Services for all LVS customers.

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I would reserve the ability to supplement this testimony and certain schedules as additional data becomes available from MGE.

Direct Testimony, pp. 10, 43, 57.

4. With the receipt of the additional data from MGE, and with diligent effort over the weekend of April 28-29, 2001, Mr. Laderoute has been able to complete analysis of those items that were necessary to estimate or for which he was only able to use incomplete data in his original testimony. He has also prepared Supplemental Direct Testimony explaining the modifications that he has made for the benefit of the parties and the Commission.

5. Midwest is herewith submitting Mr. Laderoute's Supplemental Direct Testimony at the earliest possible date to provide all parties with as much opportunity for review thereof as possible. The modifications that have been made, with one exception, are based on the additional data received subsequent to original filing or too late to be considered in the original filing. The exception is a schedule that was discussed in the

original testimony but which was inadvertently omitted from the packet that was filed and could have been handled as an errata.

6. To provide all parties with as much review as possible, Midwest is serving this Supplemental Direct Testimony on all parties via overnight delivery service.

7. The modifications consist only of updates to data supplied with the original testimony and supplements made necessary by the additional data received after the original filing. No new issues have been raised and no prejudice will or can result to any party in that Midwest has made this filing available to the other parties at the earliest opportunity and will commit to respond on an expedited basis to any additional data requests based on the supplemental filing.

8. The Supplemental Direct will substantially aid the Commission and the parties by permitting them to have more accurate and complete information in the process of this case.

WHEREFORE, Midwest Gas Users' Association prays that any required waivers or leave be granted to permit filing of the

Supplemental Direct Testimony of Charles D. Laderoute that is
tendered herewith.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR MIDWEST GAS USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing
pleading by prepaid overnight delivery to all parties by their
attorneys of record as disclosed by the pleadings and orders
herein.



Stuart W. Conrad

Dated: May 1, 2001