NEWMAN, COMLEY & RUTH

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P.O. BOX 537
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June 19, 2001

TELEPHONE: (573) 634-2266 FACSIMILE: (573) 636-3306

D. GREGORY STONEBARGER
ALICIA EMBLEY TURNER
The Honorphia Do

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

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ROBERT K. ANGSTEAD

CATHLEEN A. MARTIN

STEPHEN G. NEWMAN

MARK W. COMLEY

JOHN A. RUTH

Case No. GR-2001-292

FILED²

Missouri Public Service Commission

Dear Judge Roberts:

Please find enclosed for filing in the referenced matter an original and eight copies of the City of Kansas City's Notice of Position Regarding First Revised Stipulation and Agreement.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

Mark W. Comley

MWC:ab Enclosure

cc:

Office of Public Counsel General Counsel's Office Jeremiah D. Finnegan Gary W. Duffy Stuart W. Conrad Larry W. Dority



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

		To Commission
In the Matter of Tariff Revisions of Missouri Gas Energy,)	rission
a Division of Southern Union Company, Designed to)	Case No. GR-2001-292
Increase Rates for Natural Gas Service to Customers in)	
the Missouri Service Area of the Company)	

CITY OF KANSAS CITY'S NOTICE OF POSITION REGARDING FIRST REVISED STIPULATION AND AGREEMENT

Comes now the City of Kansas City (City), by and through counsel, and for its statement of position regarding the First Revised Stipulation and Agreement submits the following:

- 1. On or about June 12, 2001, Missouri Gas Energy (MGE), Staff and the Office of Public Counsel filed a First Revised Stipulation and Agreement (Stipulation) for Commission approval. The City of Kansas City (City) was not a signatory party to the Stipulation, but despite the lack of its signature, the City is particularly interested in one of the issues which the Stipulation resolves.
 - 2. On page 5 of the Stipulation, the parties agree in paragraph 8, that
 - . . . MGE's weatherization program shall be expanded throughout MGE's service territory as proposed by Staff witness Warren, with an additional \$90,000 per year targeted to areas other than the Kansas City metropolitan area (where the weatherization program is currently offered), subject to the availability, capability and willingness of agencies to administer such funds in such other areas of MGE's service territory.
- 3. The City endorses and supports the parties' agreements set forth in paragraph 8 of the Stipulation and joins in the request that the Commission approve the same.
- 4. With respect to the other matters resolved in the Stipulation, the City neither supports nor opposes them and neither supports nor opposes the Commission's approval of the balance of the Stipulation. The City does not request a hearing on any issue.

Respectfully submitted,

Mark W. Comley

#28847

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Attorneys for Intervener, City of Kansas City, Missouri

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, on this 19th day of June, 2001, to:

Stuart W. Conrad Finnegan, Conrad & Peterson 1209 Penntower Office Center 3100 Broadway Kansas City, MO 64111

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General Counsel's Office Public Service Commission P.O. Box 360 Jefferson City, MQ.63102 Jeremiah D. Finnegan Finnegan, Conrad & Peterson 3100 Broadway, Suite 1209 Kansas City, MO 64111

Larry W. Dority Fischer & Dority 101 West McCarty, Suite 215 Jefferson City, MO 65101

Mark W. Comley