

LAW OFFICES  
**BRYDON, SWEARENGEN & ENGLAND**

PROFESSIONAL CORPORATION  
312 EAST CAPITOL AVENUE

P. O. BOX 456  
JEFFERSON CITY, MISSOURI 65102-0456  
TELEPHONE (573) 635-7166  
FACSIMILE (573) 635-3847  
E-MAIL: DUFFY@BRYDONLAW.COM

DAVID V.G. BRYDON  
JAMES C. SWEARENGEN  
WILLIAM R. ENGLAND, III  
JOHNNY K. RICHARDSON  
GARY W. DUFFY  
PAUL A. BOUDREAU  
SONDRA B. MORGAN  
CHARLES E. SMARR

DEAN L. COOPER  
MARK G. ANDERSON  
TIMOTHY T. STEWART  
GREGORY C. MITCHELL  
BRIAN T. MCCARTNEY  
DALE T. SMITH  
BRIAN K. BOGARD

OF COUNSEL  
RICHARD T. CIOTTONÉ

June 19, 2001

**FILED<sup>2</sup>**

JUN 19 2001

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Executive Secretary  
Public Service Commission  
Governor State Office Building  
Jefferson City, MO 65102

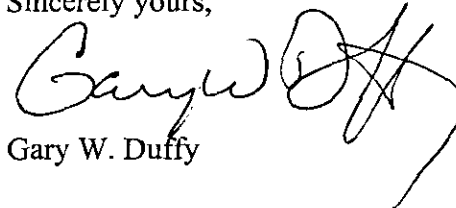
**RE:** Case No. GR-2001-292 Missouri Gas Energy

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of Missouri Gas Energy's Reply to Midwest Gas Users' Association, City of Riverside, and Jackson County's Response to Joint Motion for Partial Suspension of Procedural Schedule.

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

Sincerely yours,

  
Gary W. Duffy

Enclosures  
cc w/encl:

Doug Micheel, Office of Public Counsel  
Tim Schwarz, Office of General Counsel  
Larry W. Dority  
Mark Comley  
Stuart W. Conrad  
Jeremiah D. Finnegan  
Rob Hack

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

JUN 19 2001

Missouri Public  
Service Commission

In the matter of Missouri Gas Energy's )  
tariff sheets designed to increase rates )  
for gas service in the company's Missouri )  
service area. )

Case No. GR-2001-292

**MISSOURI GAS ENERGY'S REPLY TO MIDWEST GAS USERS'  
ASSOCIATION, CITY OF RIVERSIDE AND JACKSON COUNTY'S RESPONSE  
TO JOINT MOTION FOR PARTIAL SUSPENSION OF PROCEDURAL  
SCHEDULE**

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and respectfully submits the following reply:

1. By filing dated June 14, 2001, MGUA and JACOMO/Riverside make a number of assertions which are either mistaken, incorrect or false and which demand correction, to-wit:

- First, in paragraph 1 of their June 14 filing, MGUA and JACOMO/Riverside include the following quoted language "agreement in principle which they believe will resolve all of the issues in this proceeding." In fact, the Staff, Public Counsel and MGE stated in their June 7 filing that they "... have been able to reach agreement in principle which they believe will resolve **almost** all of the issues in this proceeding." (emphasis supplied)
- Second, contrary to the implication by MGUA and JACOMO/Riverside in their June 14 filing, there has been no attempt to "force" a settlement on any party. In fact, the First Revised Stipulation and Agreement filed on or about June 12, 2001, goes to great lengths to make clear that all rights were reserved as to issues taken by MGUA and/or JACOMO/Riverside

then known to exist. (See, First Revised Stipulation and Agreement, paragraph 2).

- Third, MGUA and JACOMO/Riverside imply in paragraphs 1 and 2 of their June 14 filing that the Staff, Public Counsel and MGE have somehow excluded MGUA and JACOMO/Riverside from settlement discussions (e.g., “these three parties have not chosen to involve Midwest, Riverside or Jackson County” and “we have not been consulted with respect to these matters”). This is not true. In fact, both MGUA and JACOMO/Riverside were apprised of the settlement in principle on June 5, 2001, and were provided with draft versions of the First Revised Stipulation and Agreement prior to its execution and filing on June 12, 2001.

Respectfully submitted,



Robert J. Hack MBE #36496  
3420 Broadway  
Kansas City, MO 64111  
(816)360-5755  
FAX: (816)360-5536

e-mail: rob.hack@southernunionco.com

Gary W. Duffy MBE #24905  
Brydon, Swearngen & England  
P.O. Box 456  
Jefferson City, MO 65102  
(573)635-7166  
FAX: (573)635-3847

e-mail: duffy@brydonlaw.com

ATTORNEYS FOR MISSOURI  
GAS ENERGY

Certificate of Service

I hereby certify that a copy of the foregoing document was mailed or hand delivered this 19th day of June, 2001, to:

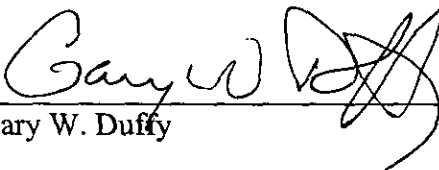
Larry W. Dority  
Fischer & Dority, P.C.  
101 Madison Street, Suite 400  
Jefferson City, MO 65101

Douglas E. Micheel  
Office of the Public Counsel  
Governor Office Building  
Jefferson City, MO

Thomas R. Schwarz, Jr.  
Missouri Public Service Commission  
Governor Office Building  
Jefferson City, MO

Mark Comley  
Newman, Comley & Ruth P.C.  
601 Monroe, Ste. 301  
Jefferson City, MO 65102

Stuart W. Conrad  
Jeremiah D. Finnegan  
Finnegan, Conrad & Peterson, L.C.  
3100 Broadway, Ste. 1209  
Kansas City, MO 64111

  
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Gary W. Duffy