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June 22, 2001

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

**FILED<sup>2</sup>**  
JUN 22 2001  
Missouri Public  
Service Commission

Re: Case No. GR-2001-292

Dear Judge Roberts:

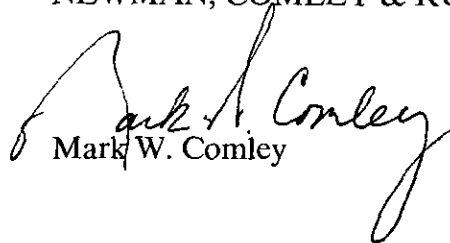
Please find enclosed for filing in the referenced matter an original and eight copies of the City of Kansas City's Statement of Position on List of Issues.

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

FILED<sup>2</sup>

JUN 22 2001

Missouri Public  
Service Commission

In the Matter of Tariff Revisions of Missouri Gas Energy, )  
a Division of Southern Union Company, Designed to )  
Increase Rates for Natural Gas Service to Customers in )  
the Missouri Service Area of the Company )

Case No. GR-2001-292

**CITY OF KANSAS CITY'S  
STATEMENT OF POSITION ON  
LIST OF ISSUES**

Comes now the City of Kansas City (Kansas City), by and through counsel, and pursuant to the Commission's order issued June 19, 2001 supplies this statement of position on the issues submitted by the parties in this case on May 30, 2001.<sup>1</sup>

**Issues 1-7, and 9-10**

With respect to the issues set forth in paragraphs 1 through 7, and 9 through 10, and the subparagraphs thereof, of the issue list(s), Kansas City takes no position.

**Issue 8**

**Is it reasonable to adopt the Staff's proposal to expand MGE's low-income weatherization program?**

Yes, it is reasonable.

**A. If so, how much more funding will be needed for the program expansion?**

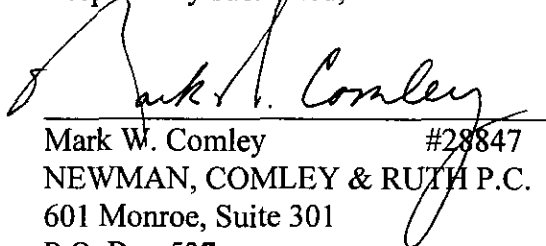
In the rebuttal testimony of Mr. Robert Jackson, Kansas City proposes that funding for the program be increased by \$250,000. Kansas City supports the agreement reached in the First Revised Stipulation and Agreement on this issue, specifically that MGE's weatherization program should

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<sup>1</sup>The Commission's order mentioned the filing of a revised list of issues but as a result of discussions during the prehearing conference scheduled June 21, 2001, Kansas City has assumed that no revised list of issues will be filed, and the set of issues filed by the parties on May 30, 2001 will govern the proceeding.

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.

Respectfully submitted,



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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 22<sup>nd</sup> day of June, 2001, to:

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Finnegan, Conrad & Peterson  
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Kansas City, MO 64111

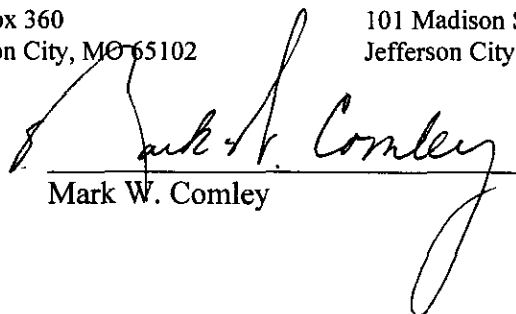
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