

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of Missouri Gas Utility, Inc.'s	)	
Purchased Gas Adjustment (PGA) Factors	)	Case No. GR-2007-0178
To be Audited in Its 2005-2006 Actual Cost	)	
Adjustment.		

In the Matter of the General Rate Increase	)	
for Natural Gas Service Provided	)	Case No. GR-2008-0060
by Missouri Gas Utility, Inc.	)	

**MOTION TO CONSOLIDATE**

Comes now Missouri Gas Utility, Inc. (MGU or Company), and, as its Motion to Consolidate, states as follows to the Missouri Public Service Commission (Commission):

1. Case No. GR-2007-0178 is an Actual Cost Adjustment case for MGU that is pending before the Commission. As described in earlier pleadings, there has been an attempt to settle that case. However, it now appears that the case cannot be settled at this time and that it will be necessary to establish a procedural schedule.

2. Case No. GR-2008-0060 is MGU's general rate case that is pending before the Commission. A procedural schedule has been set in that case. Parties are required to file direct testimony on January 18, 2008 (revenue requirement) and February 1, 2008 (rate design); rebuttal testimony is due February 29, 2008; surrebuttal testimony is due March 21, 2008; and, the case will be heard April 7-11, 2008.

3. The parties to Case No. GR-2007-0178 and GR-2008-0060 are identical (MGU, Staff of the Commission (Staff) and the Office of the Public Counsel (Public Counsel)).

4. The issue upon which the parties disagree in Case No. GR-2008-0178 is the treatment of interest costs MGU has incurred associated with its purchase of storage gas. The

alternative to treating the interest costs through the ACA/PGA process is to include those costs in base rates through the working capital adjustment.

5. The Commission has previously stated that Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact.

6. Decisions as to this issue need to be made in both cases with an awareness of the resulting impact. Failure to coordinate the decisions to some extent may disadvantage either the Company or its customers. Accordingly, there are related questions of law and fact and MGU moves that these cases be consolidated.

7. If the cases are consolidated, MGU would propose the following procedural schedule for Case No. GR-2007-0178 so that no changes would be necessary to the Case No. GR-2008-0060 procedural schedule:

Direct Testimony (All Parties)	February 20, 2008
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Rebuttal Testimony (All Parties)	March 14, 2008
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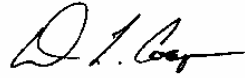
The remainder of the GR-2008-0060 procedural schedule would then apply without change.

8. Counsel for Staff and the Public Counsel have stated that they have no objection to the proposed consolidation.

WHEREFORE, Missouri Gas Utility, Inc. respectfully requests that the Commission consolidate Cases No. GR-2008-0060 and GR-2007-0178, with GR-2008-0060 being the lead

case, and adopt the procedural schedule identified herein..

Respectfully submitted,



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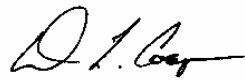
ATTORNEYS FOR  
MISSOURI GAS UTILITY, INC.

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on December 19, 2007, to the following:

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