

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

In the Matter of The Empire District Electric            )  
Company of Joplin, Missouri Tariffs Increasing        )  
Rates for Electric Service Provided in the            )  
Missouri Service Area of the Company                )            File No. ER-2012-0345

**SOUTHERN UNION COMPANY’S STATEMENT OF POSITION  
REGARDING INTERIM RATE RELIEF**

COMES NOW Southern Union Company, d/b/a Missouri Gas Energy (“MGE”), by and through counsel, and provides its Statement of Position as follows:

1. **ISSUE 1:** Is Empire facing a financial emergency or near emergency that warrants the Commission authorizing it to implement an interim-subject-to-refund rate increase pending implementation of final general rates in this case?

**MGE POSITION:** MGE has not taken a position on this issue at this time.

2. **ISSUE 2:** Do Empire’s tornado recovery costs and post-tornado cost of service due to the May 2011 Joplin tornado warrant the Commission authorizing it to implement an interim subject-to-refund rate increase pending implementation of final general rates in this case?

**MGE POSITION:** MGE has not taken a position on this issue at this time.

3. **ISSUE 3:** Is there any other basis(es) that warrants the Commission authorizing Empire to implement an interim-subject-to-refund rate increase pending implementation of final general rates in this case?

**MGE POSITION:** MGE has not taken a position on this issue at this time.

4. **ISSUE 4:** If the answer to 1, 2 or 3 is “yes,” what should be the amount of the interim-subject to-refund rate increase, and what conditions, if any, should the Commission impose on it?

**MGE POSITION:** MGE has not taken a position on Issues 1-3, so has not taken a position on this issue at this time.

Respectfully Submitted,

/s/ Todd J. Jacobs

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