

Exhibit No.: 98
Witness: Michael R. Noack
Type of Exhibit: Surrebuttal Testimony
Issue: Allocated Cost of
Service, Rate Design,
Related Tariff Issues
Sponsoring Party: Midwest Gas Users'
Association,
Jackson County, et. al.
Case No.: GR-98-140

MISSOURI PUBLIC SERVICE COMMISSION
UTILITY DIVISION

MISSOURI GAS ENERGY
CASE NO. GR-98-140

FILED
MAY 15 1998
MISSOURI
PUBLIC SERVICE COMMISSION

FILED⁴
JUL 13 2004

MISSOURI PUBLIC
PREPARED SURREBUTTAL TESTIMONY OF Service Commission
MICHAEL R. NOACK

May 15, 1998

Exhibit No. 624
Case No(s) GR-2004-0709
Date 7/2/04 Rptr SKM

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

GR-98-140

AFFIDAVIT OF MICHAEL R. NOACK

STATE OF KANSAS)
) ss
COUNTY OF JOHNSON)

Michael R. Noack, of lawful age, on his oath states:
That he has reviewed the attached written testimony in question
and answer form, all to be presented in the above case, that the
answers in the attached written testimony were given by him; that
he has knowledge of the matters set forth in such answers; that
such matters are true to the best of his knowledge, information
and belief.


Michael R. Noack

Subscribed and sworn to before me this 14th day of May, 1998.

Theresa Patterson, Notary Public
Notary Seal
Jackson County, State of Missouri
My Commission Expires: May 29, 2001


Notary Public

[SEAL]

My Commission expires: May 29, 2001

Surrebuttal Testimony of
Michael R. Noack

PREPARED REBUTTAL TESTIMONY OF
MICHAEL R. NOACK

1 Q. Please state your name and business address.

2 A. Michael R. Noack, 8826 Santa Fe Drive, Suite 304, Overland
3 Park, Kansas 66212.
4

5 Q. Are you the same Michael R. Noack who previously submitted
6 prepared direct and rebuttal testimony in this proceeding?

7 A. Yes, I am.
8

9 Q. What is the purpose of this surrebuttal testimony?

10 A. I will respond to statements in rebuttal testimony of MGE
11 witnesses Cummings and Langston, Public Counsel witnesses
12 Kind, Hall and Hong Hu, and Staff witness Beck.
13

14 Q. Do you agree with Dr. Cummings on page 26 of his rebuttal
15 testimony where he states that LVS customers currently can
16 be either sales or transport customers and thus the gas
17 inventory component of rate base should be allocated to the
18 LVS class?

19 A. No I do not. On page 30 of his rebuttal testimony he states
20 that the company is proposing to make LVS exclusively a
21 transportation tariff and in fact MGE has made adjustments
22 to reclassify revenue from sales customers in the LVS class

Surrebuttal Testimony of
Michael R. Noack

1 to the LGS class. Under those circumstances the gas inven-
2 tory component should not be allocated to the LVS class.

3
4 Q. Dr. Cummings on page 28 of his rebuttal testimony discussed
5 his disagreement with your argument that the customers
6 should pay customer charges applicable to their class status
7 before becoming transportation customers. Do you agree with
8 this testimony?

9 A. No, I do not. Dr. Cummings has misunderstood my testimony.
10 He appears to believe I am suggesting that transportation
11 service be extended to the SGS or LGS class and that is not
12 my testimony.

13
14 My testimony relates to those few transportation customers
15 on the MGE system which have multiple meters serving a
16 contiguous location such as Central Missouri State Universi-
17 ty with 15 or UMKC with 5. In each of those cases, the
18 customer has available to them the opportunity to aggregate
19 usage in order to transport gas under MGE's contiguous
20 property language in its transportation tariff. In order to
21 transport, however, each additional meter which is added to
22 the transportation contract has to have two things done to
23 it: first, a \$5,000 EGM meter has to be stuck on top of the
24 existing meter at the customer's expense; and secondly,