

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

In the Matter of Class Action Claims by Missouri)	
Natural Gas Local Distribution Companies in the)	Case No. GO-2006-0449
NYMEX Natural Gas Lawsuit.)	

MISSOURI GAS ENERGY’S RESPONSE TO ORDER TO SHOW CAUSE

COMES NOW Missouri Gas Energy (MGE), a division of Southern Union Company, and, in response to the Missouri Public Service Commission’s (Commission) Order to Show Cause, states as follows:

1. On May 25, 2006, the Commission issued its Order to Show Cause, which was assigned the above-referenced case number. The Order directed each Missouri local distribution company (LDC) to “show cause why it should not be required to file a claim seeking distribution from the settlement” reached in litigation in the Southern District of New York concerning “NYMEX” natural gas futures and options contracts.

2. An MGE representative has contacted the attorney for the class in the subject litigation and been advised that the class is comprised of only those parties who traded natural gas on the NYMEX during the class period of June 1, 1999 through December 31, 2002. MGE understands that those parties that completed over the counter transactions outside of the NYMEX do not qualify as members of the class.

3. This is supported by the language of the Notice of Proposed Partial Settlement of Action in the subject litigation. That document describes the class as “all persons or entities who purchased, sold, or settled NYMEX Natural Gas Contracts, as an opening or closing transaction or otherwise, between June 1, 1999 until December 31, 2002.” “NYMEX Natural Gas contracts” are defined as “any commodity futures

(including any option thereon), basis, or swap contract related to natural gas that was traded on NYMEX, or any combination thereof, that was transacted or settled during the class period.”

4. MGE has researched its records and finds no transactions on the NYMEX during the class period. For that reason, MGE does not intend to file a claim seeking distribution from the settlement referenced by the Commission.

WHEREFORE, MGE respectfully requests that the Commission consider this pleading to satisfy the Order to Show Cause.

Respectfully Submitted,

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BRYDON, SWEARENGEN & ENGLAND, P.C.
Dean L. Cooper MBE#36592
312 E. Capitol Ave.
PO Box 456
Jefferson City, MO 65102
(573) 635-7166
(573) 635-7431 (facsimile)
dcooper@brydonlaw.com

ATTORNEYS FOR MISSOURI GAS ENERGY,
A DIVISION OF SOUTHERN UNION COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by electronic mail, on this 7th day of June, 2006, to the following:

Lera Shemwell
General Counsel's Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102-0360

Lewis Mills
Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102-2230

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