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October 2, 2002

FILED³

OCT 02 2002

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Mo. 65102-0360

Missouri Public
Service Commission

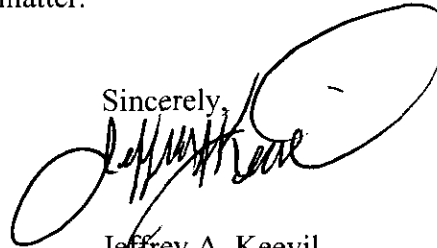
RE: Case Nos. GR-2001-382, GR-2000-425, GR-99-304 and GR-98-167

Dear Mr. Roberts:

Enclosed for filing in the above-referenced cases are an original and the appropriate number of copies of a REPLY TO STAFF'S RESPONSE on behalf of Riverside Pipeline Company, L.P., Mid-Kansas Partnership and Kansas Pipeline Company.

Copies of this filing have on this date been mailed or hand-delivered to counsel of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er
Enclosures
cc: counsel of record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

OCT 02 2002

Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment Tariff Revisions) Case No. GR-2001-382
To be Reviewed in its 2000-2001 Actual)
Cost Adjustment.)

In the Matter of Missouri Gas Energy's)
Purchased Gas Cost Adjustment Factors) Case No. GR-2000-425
To be Reviewed in its 1999-2000 Actual)
Cost Adjustment.)

In the Matter of Missouri Gas Energy's)
Purchased Gas Cost Adjustment Factors) Case No. GR-99-304
To be Reviewed in its 1998-1999 Actual)
Cost Adjustment.)

In the Matter of Missouri Gas Energy's)
Purchased Gas Cost Adjustment Tariff) Case No. GR-98-167
Revisions to be Reviewed in its 1997-1998)
Actual Cost Adjustment.)

REPLY TO STAFF'S RESPONSE

COME NOW Riverside Pipeline Company, L.P. ("RPC"), Mid-Kansas
Partnership ("MKP") and Kansas Pipeline Company ("KPC") (collectively
"Intervenors"), and for their reply to Staff's Response filed herein on September 30,
2002, respectfully state as follows:

1. Intervenors filed an Application for Rehearing, Reconsideration and/or
Clarification in these cases on September 19, 2002, in which they addressed the matter of
the filed rate doctrine, and filed a Response to MGE'S Application for Rehearing and
Motion for Reconsideration in these cases on September 27, 2002, in which they
addressed why the Commission should not proceed to hearing on all issues of these cases

without bifurcation as advocated by Staff in its Response filed herein on September 30, 2002. Therefore, most of the matters mentioned by Staff in its September 30, 2002 Response do not warrant further reply by Intervenor and Intervenor would refer the Commission to its previous filings herein for discussion of such matters. However, one item in Staff's Response of September 30, 2002, begs reply.

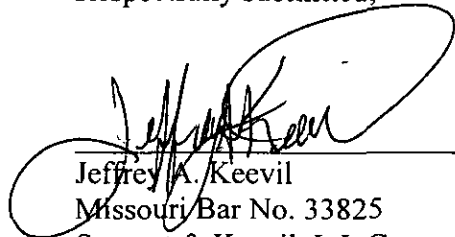
2. Staff states in its Response of September 30, 2002, that "While Staff concedes that MKP [Intervenor] is entitled to discovery, Staff continues to wonder at MKP's [Intervenor's] perceived need to re-plow ground that has been plowed so thoroughly for so many years." To use Staff's phraseology, Intervenor continue to wonder at Staff's perceived need to re-litigate the same adjustment that Staff lost in Case No. GR-96-450. In the Commission's Order Denying Application for Rehearing issued in Case No. GR-96-450 the Commission stated that: "The Commission has found that the evidence for imprudence that Staff presented was not persuasive. *Staff would need to present more substantial and persuasive evidence.*" (emphasis added) If Staff has such new, additional substantial and persuasive evidence, then Intervenor's need to conduct additional discovery should be obvious, Staff's colloquial response notwithstanding; and if Staff does not have such new, additional substantial and persuasive evidence, according to the Commission's order in Case No. GR-96-450, Staff should not continue to re-litigate the same adjustment from Case No. GR-96-450.¹ By continuing to re-litigate the adjustment it lost in Case No. GR-96-450 it is Staff, not Intervenor, which is delaying

¹ As discussed in paragraph 5 of Intervenor's Response to MGE'S Application for Rehearing and Motion for Reconsideration filed in these cases on September 27, 2002, Intervenor submit that Staff is barred from pursuing its MKP/RPC contract adjustment in these cases in any event, even if Staff now has new, additional evidence. However, taking the approach reflected in the Commission's September 10 Order -- not proceeding on the proposed MKP/RPC contract adjustment pending a final, non-appealable resolution of Case No. GR-96-450 -- avoids the need for the parties and the Commission to address those reasons at this time, since the court decision in the appeal of Case No. GR-96-450 may render them moot.

the resolution of what Staff refers to as "[t]he oldest case" which is "already four years old."

WHEREFORE, Intervenor respectfully request the Commission grant the relief requested in their Application for Rehearing, Reconsideration and/or Clarification filed in these cases on September 19, 2002, concerning the filed rate doctrine; in the event that the Commission does not determine that the filed rate doctrine precludes the Commission from considering the Staff's proposed MKP/RPC contract adjustment, Intervenor respectfully request the Commission issue its order affirming its September 10 Order as to the matter of bifurcating the procedural schedule.

Respectfully submitted,



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PIPELINE COMPANY, L.P. AND MID-
KANSAS PARTNERSHIP

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to counsel for parties of record on this 2nd day of October, 2002.

