## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

FILED JUN 2 2 2004
SEASIES SEARCH SIGN Case No. GR-2004-0209

In the Matter of Missouri Gas Energy's Tariff Sheets Designed to Increase Rates for Gas Service in the Company's Missouri ) Service Area

Tariff No. YG-2004-0624

## CITY OF JOPLIN'S AMENDED STATEMENT OF POSITION

COMES NOW, the City of Joplin, by and through counsel, and amends its Statement of Position filed on June 16, 2004 as follows:

City of Joplin supports the position of the Office of Public Counsel with respect to issues related to the rate of return, and class costs of service/rate design.

City of Joplin supports the position of the Staff of the Public Service Commission with respect to revenue issues, expense issues, and low income proposals.

City of Joplin takes no position with respect to the remaining issues. City of Joplin reserves the right to take a position on such issues based upon all the record evidence at a later date.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

By:

James B. Deutsch, #27093 Marc H. Ellinger, #40828

Attorney at Law 308 East High Street

Suite 301

Jefferson City, MO 65101

Telephone No.: (573) 634-2500 Facsimile No.: (573) 634-3358

## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were sent to the following counsel of record via U.S. mail, postage prepaid on this 22<sup>nd</sup> day of June, 2004.

Robert V. Franson Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Mark W. Comley Newman, Comley & Ruth, P.C. 601 Monroe Street, Suite 301 Jefferson City, MO 65102-0537

Jeremiah Finnegan Finnegan, Conrad & Peterson, L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, MO 64111

Douglas E. Micheel, Esq. Deputy Public Counsel P.O. Box 2230, Suite 650 Jefferson City, MO 65102

James C. Swearengen Brydon, Swearengen & England P.O. Box 456 Jefferson City, MO 65102-0456

Stuart W. Conrad Finnegan, Conrad & Peterson, L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, MO 64111

Craig Paulson AFCESA/ULT 139 Barnes Drive Tyndall Air Force Base, FL 32403

Marc H. Ellinger