

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

Janet E. Parks,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>Case No. GC-2011-0232</u></b>
	)	
Southern Union Company,	)	
d/b/a Missouri Gas Energy,	)	
	)	
Respondent.	)	

**STAFF RESPONSE TO ORDER DIRECTING FILING**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and files its *Staff Response to Order Directing Filing* with the Missouri Public Service Commission (“Commission”) respectfully stating the following:

1. On October 4, 2011, Ms. Parks filed a letter with the Commission, indicating that she was undergoing medical treatment away from home, and did not have a projected date as to when she would be home. She requested restoration of her natural gas service for the duration of the formal complaint process.
2. On October 4, 2011, the Commission issued an *Order* directing the parties to file a response to Ms. Parks’ October 4 *Status Report*.
3. Southern Union Company d/b/a Missouri Gas Energy (“MGE”) filed its *Response to Order Directing Filing* on October 25, 2011, in which reiterated its position that is has acted consistently with its tariffs, and set forth terms on which it would resume service to Ms. Parks.

4. On October 26, 2011, the Commission issued its *Order Denying Motion for Relief Pending Decision* in which it denied Ms. Parks request for service pending the resolution of her complaint.

5. This filing is intended to comply with the Commission's October 4 *Order*.

6. Ms. Parks has not provided any new information, and the Commission has already denied Ms. Parks request for service pending the resolution of her complaint. Therefore Staff's conclusion in this matter has not changed. Staff cannot conclude that MGE has violated any Commission rule or statute, or its tariff.

**WHEREFORE**, the Staff respectfully submits its *Staff Response to Order Directing Filing* for the Commission's information and consideration.

Respectfully submitted,  
/s/ Meghan E. McClowry  
Meghan E. McClowry  
Legal Counsel  
Missouri Bar No. 63070

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-6651 (Telephone)  
(573) 751-9285 (Fax)  
Meghan.mcclowry@psc.mo.gov

#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 1st day of November, 2011.

/s/ Meghan E. McClowry