

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of Missouri Gas Energy's)	
Application for a Determination of Certain)	
Matters Pertaining to its Safety Line)	Case No. GO-2002-48
Replacement Program.)	

ADDENDUM TO STAFF'S SUPPLEMENTAL REPORT AND RECOMMENDATION

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") in the above-captioned matter and respectfully states as follows:

1. On September 16, 2005, Missouri Gas Energy, a division of Southern Union Company ("MGE" or "Company"), filed with the Commission an Application to amend the Company's Safety Line Replacement Program ("SLRP") as it pertains to maintenance and replacement of service lines and mains associated with master meter trailer parks. In particular, MGE seeks permission to change the current Commission-ordered requirement that it complete, by June 30, 2006, line replacements in the following two master meter trailer parks:

- a) Finley River Mobile Home Park, Brick 5th Street and Church, Ozark, Missouri; and
- b) Heistland Mobile Home Park, Route 6, Box 150, Joplin, Missouri.

The Company proposes instead to increase its leak-surveying frequency from annual to semi-annual.

2. In its Supplemental Report And Recommendation, filed November 30, 2005, the Staff recommended, among other things, Commission approval of MGE's request, with a leak-survey schedule specified by Staff in that filing. The Memorandum attached hereto (Appendix A) provides updated information regarding subsequent communications between MGE and the

owner of the Heistland Mobile Home Park. The new information lends further support to the recommendations contained in the Staff's November 30, 2005 filing.

WHEREFORE, the Staff respectfully submits this Addendum to its November 30, 2005 Supplemental Report and Recommendation.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Dennis L. Frey

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Senior Counsel
Missouri Bar No. 44697

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 16th day of December 2005.

/s/ Dennis L. Frey

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GO-2002-48, Missouri Gas Energy

FROM: Michael E. Taylor, Energy Department--Safety/Engineering

/s/ Michael E. Taylor 12/15/05
Project Coordinator / Date

/s/ Thomas R. Schwarz, Jr. 12/16/05
General Counsel's Office / Date

SUBJECT: Addendum to Staff Supplemental Report and Recommendation for Approval of
the Application to Amend Safety Line Replacement Program

DATE: December 15, 2005

On November 30, 2005, Staff filed a Supplemental Report and Recommendation in this case. Since that filing, Staff has received additional information that is relevant to the case. Missouri Gas Energy (MGE) prepared a cost estimate for the line replacement in the Heistland Mobile Home Park. Under current tariffs, the owner of the property would share in the cost of the line replacement. When presented with this cost estimate, the owner was not willing to pay for his portion of the line replacement cost at this time (based on the uncertain future of this mobile home park).

This additional information does not change the previously submitted Staff recommendation regarding the application.