

MISSOURI GAS ENERGY
A Division of Southern Union Company

**MISSOURI PUBLIC SERVICE COMMISSION
DATA INFORMATION REQUEST RESPONSE**

Case No: GR-2001-382

Data Request No: 153

Requested From: Mike Noack

Date Requested: May 22, 2003

Information Requested: The Company has suggested that the heating and/or base load formulas used in the reliability reports supplied to Staff are inaccurate.

- a. Please specify the formulas that the Company is suggesting are inaccurate based upon "actual delivered volumes" shown in MTL-14.
- b. Please indicate all areas (such as nominations of flowing supply, storage operations, peak day planning) of the Company's gas procurement function that are impacted by these formulas.
- c. Please provide a copy of all reviews and analysis done to determine the accuracy of these formulas. Provide the analysis in both hard copy and electronic file(s).
- d. Please provide the formulas that the Company considers as accurate for the 2000/2001 ACA period and provide the assumptions and data used to develop these formulas. Provide the data and analysis in both hard copy and electronic files.

Requested By: Lesa Jenkins

Information Provided:

MGE has not argued that the Reliability Report information was inaccurate. Rather, Staff has argued that the Reliability Report information is inaccurate (or at least not up to date since it is based on 1994 data and not current data.) Once becoming aware of staff's concerns, MGE sought to address this issue when it filed its 2002/2003 reliability report.

Date Response Received: 6/19/03

Signed By: 

Date: 6/16/03