

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

In the Matter of the Application of Kansas City	)	
Power & Light Company for Approval to Make	)	
Certain Changes in its Charges for Electric	)	Case No. ER-2006-0314
Service to Begin the Implementation of Its	)	
Regulatory Plan.	)	

**PREHEARING BRIEF  
OF MISSOURI GAS ENERGY**

COMES NOW Missouri Gas Energy (“MGE”), an operating division of Southern Union Company (“Southern Union”), by counsel, and for its prehearing brief in this matter respectfully states as follows to the Missouri Public Service Commission (the “Commission”):

1. By its Order Setting Procedural Schedule issued March 29, 2006, the Commission directed the parties hereto to file prehearing briefs by October 12, 2006.

2. Through MGE, Southern Union is a “gas corporation” and “public utility” as those terms are defined in RSMo. §386.020. MGE’s principal Missouri office is located at 3420 Broadway, Kansas City, Missouri, 64111.

3. As a provider of natural gas service in a territory which substantially overlaps the territory in which KCPL provides electric service, MGE competes with KCPL for business opportunities. Accordingly, MGE moved to intervene in this matter because of an interest in the areas of class cost-of-service, rate design, and rules of service.

4. Due to MGE’s limited involvement with this case, at this time, MGE takes no position on the issues set forth in the List of Issues filed herein by the Staff of the Commission on October 6, 2006. MGE reserves its right, as a party to this proceeding, to fully participate in the evidentiary hearings to be held herein.

Respectfully submitted,

/s/ Diana C. Carter

Diana C. Carter                      MBE #50527  
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ATTORNEYS FOR MISSOURI GAS ENERGY

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, mailed by U.S. mail, or electronically transmitted on this 12<sup>th</sup> day of October, 2006, to all parties of record.

/s/ Diana C. Carter