

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

In the Matter of the Application of Missouri Gas	)	
Energy, a division of Southern Union Company, for	)	<u>Case No. GO-2011-0003</u>
Approval to Change Its Infrastructure System	)	YG-2011-0011
Replacement Surcharge.	)	

**MOTION FOR EXPEDITED TREATMENT**

COMES NOW Southern Union Company, d/b/a Missouri Gas Energy, (MGE or Applicant), and, in accordance with Missouri Public Service Commission (Commission) Rules 4 CSR 240-2.080(16) and 4 CSR 240-2.065(2), moves the Commission for expedited treatment of MGE's tariff filed on September 8, 2010:

1. On September 8, 2010, the Commission issued its Order Approving Infrastructure System Replacement Surcharge and Rejecting Tariff. In that Order, the Commission rejected the tariff sheet filed by MGE on June 2, 2010 (YG-2011-0011), and authorized MGE establish an Infrastructure System Replacement Surcharge (ISRS) to recover annual revenues of \$1,379,866 and to file an ISRS rate for each customer class as reflected in Appendix B. Further, the Commission granted MGE's request for a waiver of Commission Rule 4 CSR 240-3.265(14).

2. Concurrently, with the filing of this Motion, MGE filed a tariff sheet in order to comply with the Commission Order (11<sup>th</sup> Revised Sheet No. 10) (provided herewith as **Appendix A**). This tariff sheet carried a proposed effective date of October 8, 2010 (30 days), and was assigned tracking number YG-2011-0119.

3. MGE seeks the Commission's order allowing the proposed tariff sheet to go into effect on September 18, 2010, or as soon as the Commission shall find to be reasonable.

4. The ISRS process is authorized by Sections 393.1009, 393.1012 and 393.1015, RSMo, and Commission Rule 4 CSR 240-3.265. Its goal is to provide eligible gas corporations with the ability to recover, on a timely basis, certain infrastructure replacement costs outside of a formal rate case filing via the ISRS. The Commission has authorized such an ISRS in this case and there are no further procedures to be completed. Granting this Motion will afford MGE the timely rate relief which the Commission has found to be justified. As such, Commission action as requested will be consistent with the public interest as established by the General Assembly and Commission order.

5. The subject tariff sheet and this Motion have been filed as soon as possible after the issuance of the Commission's Order Approving Infrastructure System Replacement Surcharge and Rejecting Tariff.

WHEREFORE, for the foregoing reasons, MGE respectfully requests the Commission to grant MGE's Motion for Expedited Treatment and approve MGE's proposed tariff sheet (11<sup>th</sup> Revised Sheet No. 10) effective September 18, 2010, or as soon as the Commission shall find to be reasonable.

Respectfully submitted,



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ATTORNEYS FOR Southern Union Company, d/b/a  
Missouri Gas Energy

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on September 8, 2010, to the following:

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A handwritten signature in black ink, appearing to read "T. J. Jacobs", with a long, sweeping flourish extending to the right.

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Todd J. Jacobs