

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

Janet E. Parks,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2011-0232
)	
Missouri Gas Energy,)	
)	
Respondent.)	

MISSOURI GAS ENERGY’S FIRST SET OF DATA REQUESTS TO MS. PARKS

Comes now Southern Union Company, d/b/a Missouri Gas Energy (MGE), in accordance with Commission Rule 4 CSR 240-2.090(2) and submits the following first set of data requests to Complainant Janet E. Parks (also referred to as “you,” “Ms. Parks” or “Complainant”):

DATA REQUESTS

1. What date did you first move to 302 Kimberly Dr, Belton, Missouri 64012?

Ms. Parks’ Response:

2. During what periods of time have you resided at 302 Kimberly Dr, Belton, Missouri 64012? Please provide dates.

Ms. Parks’ Response:

3. Please provide a list of individuals who have resided at 302 Kimberly Dr., Belton, Missouri since 1996.

Ms. Parks’ Response:

4. Please provide a list of your residence addresses since 1996, and include the dates that you resided at those locations.

Ms. Parks' Response:

RESIDENCE ADDRESS	DATES

5. Do you own or rent the house located at 302 Kimberly Dr? If you own the house, when did you purchase it? Who did you purchase the home from?

Ms. Parks' Response:

6. MGE's records indicate that natural gas service was provided in the name of Willa Mosley from October 5, 1991 until June 9, 2003. Who is Willa Mosley and what relation is (or was) she to you?

Ms. Parks' Response:

7. Is Willa Mosley deceased? If so, when did she die?

Ms. Parks' Response:

8. Who lived at 302 Kimberly Dr., Belton, MO at the time Ms. Mosley died?

Ms. Parks' Response:

9. Please provide a copy of any lease or other ownership documentation (including title documents) in your possession regarding who lived at, or owned, 302 Kimberly Drive after Ms. Mosley died.

Ms. Parks' Response:

10. MGE's records indicate that natural gas service was provided in the name of Elaine McCormick from November 3, 2003 until April 15, 2005. Who is Elaine McCormick? What, if any, relation is she to you? Please provide contact information for Ms. McCormick.

Ms. Parks' Response:

11. What is the name of your mother's stepdaughter who you reference in your formal complaint?

Ms. Parks' Response:

12. Per the formal complaint, you allege that MGE refused service to Mr. Allen. Who is Mr. Allen? Please provide contact information for Mr. Allen.

Ms. Parks' Response:

13. When did Mr. Allen request service at 302 Kimberly Dr, Belton, Missouri 64012?

Ms. Parks' Response:

14. Between September 16, 2005, when service was initiated in your name and May 15, 2007 when the service was last shut off, how many payments did you make to MGE?

Ms. Parks' Response:

15. Please identify what information you have in your possession that makes you believe that MGE stole \$1,000.00 from your bank account?

Ms. Parks' Response:

16. Please provide a copy of any report that you filed with law enforcement related to the alleged theft of \$1,000.00 from your bank account.

Ms. Parks' Response:

17. Please provide any documentation you may have and summarize any communications that you had with your bank regarding the alleged theft of \$1,000.00 from your bank account.

Ms. Parks' Response:

18. Please explain, in detail how you believe MGE allegedly stole \$1,000.00 from your bank account.

Ms. Parks' Response:

19. Please indicate what actions that you took to address or remedy the alleged theft of \$1,000 from your bank account.

Ms. Parks' Response:

20. What information is in your possession that makes you believe that MGE has sent you bills in the summer ranging from \$500 to \$1,000 per month? Please provide copies of any such bills that you have in your possession.

Ms. Parks' Response:

21. Please list those persons you believe have information related to your complaint. Provide copies of any written statements you have that have been prepared by any of these persons.

Ms. Parks' Response:

22. Please provide copies of any certified mail receipts related to information you have provided to MGE.

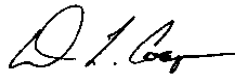
Ms. Parks' Response:

The information provided to Missouri Gas Energy in response to the above information request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned.

Janet E. Parks

Date

Respectfully submitted,



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ATTORNEYS FOR SOUTHERN UNION
COMPANY, D/B/A MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by U.S. Mail, postage prepaid (to Ms. Parks), and by electronic mail (to Ms. McClowry and Mr. Mills) this 15th day of July, 2011, to:

Meghan McClowry
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Janet E. Parks
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Belton, MO 64012

