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July 3, 2003

VIA HAND DELIVERY

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

FILED²
JUL 03 2003
Missouri Public
Service Commission

**Re: In the Matter of a Proposed Amendment to Commission Rule 4 CSR 240-13.055
Case No. AX-2003-0193**

Dear Mr. Roberts:

On behalf of Missouri Gas Energy, a division of Southern Union Company, I deliver herewith an original and eight (8) copies of MGE's Initial Comments, for filing with the Commission in the referenced matter. I would appreciate it if you would see that copies are distributed to the appropriate Commission personnel. Service copies have been mailed or hand-delivered this date.

I have also enclosed an extra copy which I request that you stamp "Filed" and return to the person delivering them to you.

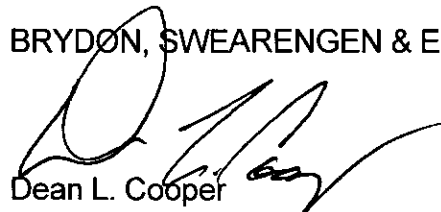
Thank you for your attention in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Dean L. Cooper



DLC/ccp
Enclosures

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

In the Matter of a Proposed Amendment)
to Commission Rule 4 CSR 240-13.055)

Case No. AX-2003-0193

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Service Commission**

MGE'S INITIAL COMMENTS

Comes Now Missouri Gas Energy, a division of Southern Union Company ("MGE"), by and through counsel, and hereby respectfully submits its initial comments to the Missouri Public Service Commission ("Commission"):

The stated purpose of this proposed rule is to make available to the public certain aggregate information related to the cold weather rule in a form such that there will no longer be a need to release individual reports upon a party's request.

MGE has no objection to making available to the public aggregated information regarding disconnections for non-payment.

MGE believes that it can make the information sought by the following sections of the proposed rule available with little additional costs: (B)1 and 3; (E)1; (F)1 and 2; (G) 1, 2 and 3; (H) 1, 2 and 3; (I); (J); and, (K).

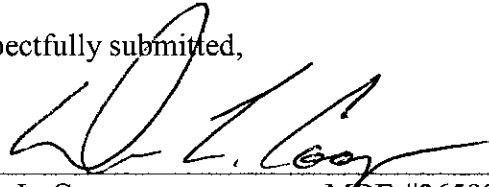
The remaining information can be provided. However, to do so will require programming changes to MGE's customer information system. It is estimated that these changes will take approximately 3-4 months from such time as MGE knows exactly what information will be required by the rule. Accordingly, MGE would ask that the final rule provide for an effective date that is at least 90 days after publication of the final rule.

Additionally, MGE suggests that the rule would be clearer, if the Commission were to address the following:

- (1) Reference is made in sub-paragraph (A) to “how many customers were disconnected at the end of the period.” Does this revision seek the number of customers disconnected for non-payment, or a total number of disconnections?
- (2) Reference is made in (A)1 to both “disconnected” and “discontinued” customers. Is there a difference between the two?
- (3) Reference is made in sub-paragraphs (B)2 and (D)2 to a “non-Cold Weather Rule pay agreement.” What is a “non-Cold Weather Rule pay agreement?”
- (4) There is a distinction made in sub-paragraphs (C)1 and 2 between “received” (amounts “pledged or paid”) and “provided by.” Do these terms differ?

WHEREFORE, MGE respectfully requests that the Commission consider MGE’s above comments in addressing the proposed rule.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered this 3rd day of July, 2003, to:

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