

Mel Carnahan Governor

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September 27, 1999

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

FILED

SEP 27 1999

RE: Missouri Gas Energy Case No. GO-2000-231

Missouri Public Service Commission

Dear Mr. Roberts:

Enclosed for filing please find the original and fourteen copies of **Public Counsel's Response to Order Directing Filing.** I have on this date mailed or hand-delivered copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

Douglas E. Micheel Senior Public Counsel

DEM/mk

Enclosures

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

		OF MISSOURI	FILED
In the Matter of Missouri Gas Energy's Tariff Sheets Designed to Renew for an Additional Year the Price Stabilization Fund and Capacity Release Incentive Mechanism.)))	Case No. GO-2000-231	Ilssouri Public Commission

Public Counsel's Response to Order Directing Filing

Comes now the Office of the Public Counsel ("Public Counsel") and for its response to Order Directing Filing in the above referenced case states as follows:

- On or about September 14, 1999 Missouri Gas Energy ("MGE") filed tariff sheets 1. proposed to become effective on October 15, 1999. The proposed tariff sheets were designed to extend the experimental Price Stabilization Fund ("PSF") through the winter of 1999-2000 and to allow it to expire on the effective date of the summer PGA filing on or about April 1, 2000. In addition the filing proposes to extend the experimental capacity release incentive program mechanism for a period of one year from November 1, 1999 through October 31, 2000.
- 2. The Office of the Public Counsel does not oppose the extension of the experimental Price Stabilization Fund for another year. Nor does Public Counsel oppose the extension of the experimental capacity release incentive program for another year in light of the Commission's recent decision in case no. GT-99-303.

Wherefore: the Office of the Public Counsel does not oppose the Commission approving Missouri Gas Energy's Application to renew the Price Stabilization Fund and capacity release mechanism on an expedited basis for a limited term of one year.

Respectfully submitted, OFFICE OF THE PUBLIC COUNSEL

Douglas E. Micheel, Esq.

(Bar No. 38371)

Senior Public Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been mailed or hand-delivered to the following on this 27th day of September, 1999:

Robert J. Hack Missouri Gas Energy 3420 Broadway Kansas City, MO 64111-2404 Thomas R. Schwarz, Jr. Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

J. E. Milsel