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

In the Matter of the Determination of	)	
Carrying Costs of the Phase-In Tariffs	)	File No. ER-2012-0024
of KCP&L Greater Missouri Operations	)	
Company.	)	

## MGE'S MOTION TO WITHDRAW

COMES NOW Southern Union Company, d/b/a Missouri Gas Energy (MGE), by and through counsel, and, as its Motion to Withdraw, states as follows to the Missouri Public Service Commission (Commission):

- 1. On July 22, 2011, the Commission issued an order opening a new case (File No. ET-2012-0017) regarding the carrying costs for the phase-in tariffs for KCP&L Greater Missouri Operations Company (GMO).
- 2. With its July 22 order in File No. ET-2012-0017, parties to GMO's recently completed rate case (File No. ER-2010-0356) were made parties to the new proceeding, without the need for further intervention.
- 3. On July 25, 2011, the Commission closed File No. ET-2012-0017, opened File No. ER-2012-0024, and stated that the procedural schedule adopted in ET-2012-0017 was to be the procedural schedule in this matter (File No. ER-2012-0024).
- 4. MGE was granted intervention in GMO's rate case (ER-2010-0356) by Commission order dated July 15, 2010. Pursuant to the Commission's July 22nd order, MGE was made a party to File No. ET-2012-0017, and then to this proceeding (File No. ER-2012-0024).
- 5. This proceeding (File No. ER-2012-0024) involves an issue (carrying costs for GMO's phase-in tariffs) that is beyond the issues for which MGE originally sought intervention. Therefore, MGE hereby seeks to withdraw from this proceeding.

WHEREFORE, MGE respectfully requests that the Commission issue its order granting MGE's motion to withdraw from this case.

Respectfully submitted,

1. Com

Dean L. Cooper

MBE #36592

BRYDON, SWEARENGEN & ENGLAND P.C.

312 E. Capitol Avenue

P. O. Box 456

Jefferson City, MO 65102

Phone: (573) 635-7166 Fax: (573) 634-3847

dcooper@brydonlaw.com

Todd J. Jacobs

MBE #52366

Senior Attorney

Missouri Gas Energy

3420 Broadway

Kansas City, MO 64111

816-360-5976

816-360-5903 (fax)

Todd.Jacobs@sug.com

DI.Com

ATTORNEYS FOR MISSOURI GAS ENERGY

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record this 19<sup>th</sup> day of September, 2011.