

**MISSOURI GAS ENERGY**

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FILED⁴**JUL 1 8 2004****ROBERT J. HACK**

Vice President, Pricing & Regulatory Affairs

February 13, 2004

Missouri Public
Service Commission

Mr. Douglas E. Micheel
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

VIA FAX & U.S. MAIL

Mr. Cliff Snodgrass
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Mr. Robert Franson
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

**RE: Case Nos. GM-2000-43, GM-2000-500, GM-2000-502, GM-2000-503
and GM-2003-0238, Southern Union Company**

Dear Robert, Cliff and Doug:

Pursuant to provisions of the Commission's orders in the above-referenced cases, enclosed is a report containing assorted information for the fourth quarter of calendar year 2003 and for the entirety of calendar year 2003.

This report shows that for calendar year 2003, MGE deviated above the 24-month average performance measure for abandoned call rate ("ACR") and deviated above both the 24-month average and maximum allowable levels for average speed of answer ("ASA"). Explanation of this deviation is contained in the draft report. According to the orders, the Staff and Public Counsel have 30 days to respond to this draft, and MGE is to file a final report with the Commission by the end of May.

If you have any questions regarding the enclosed information, please feel free to give me a call.

Sincerely,

CC: Carlton Ricketts
Ron Crow
Paul Boudreau
Debbie Bernsen

Exhibit No. 39
Case No(s). FR-2004-0209
Date 6-23-04 Rptr CS

Missouri Gas Energy
A Division of Southern Union Company

GM-2000-43
GM-2000-500
GM-2000-502
GM-2000-503
GM-2003-0238
Reporting

DRAFT

February 15, 2004
(Reporting for October 1, 2003, through December 31, 2003
and
Draft Report for Calendar Year 2003)