

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

In the Matter of Missouri Gas Energy's)	
Tariffs to Implement a General Rate)	Case No. GR-2004-0209
Increase for Natural Gas Service)	

MOTION TO ADMIT PRO HAC VICE

COMES NOW Michael M. Fay ("Fay"), on behalf of Missouri Gas Energy, a division of Southern Union Company ("MGE"), and, pursuant to 4 CSR 240-2.040(3)(C) and Missouri Supreme Court Rule 9.03, respectfully states as follows to the Missouri Public Service Commission:

1. On November 4, 2003, MGE filed with the Commission tariff sheets designed to increase its rates for natural gas service. The proposed tariff sheets bear an effective date of December 4, 2003. By its Order of November 7, 2003, the Commission suspended MGE's proposed tariff, and the Commission thereafter established a procedural schedule.
2. Fay seeks to enter his appearance herein on behalf of MGE and represent MGE in certain aspects of this proceeding.
3. Fay is employed by the law firm of Kasowitz, Benson, Torres & Friedman located at 1633 Broadway, New York, NY, 10019. Fay is not a member of the Missouri Bar, but is a member in good standing of the New York Bar, and is admitted to practice in the Eastern and Southern Districts of New York.
4. Fay's New York federal bar number is MF-7006. Neither Fay nor any member of the firm of Kasowitz, Benson, Torres & Friedman is disqualified to appear in any court in New York.

5. James C. Swearengen of the law firm of Brydon, Swearengen & England, P.C., is a member in good standing of the Missouri Bar and has an office at 312 E. Capitol Ave., P.O. Box 456, Jefferson City, Missouri, 65102.

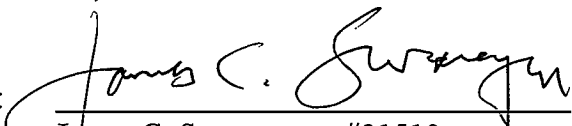
6. Swearengen has entered his appearance herein on behalf of MGE and, in conjunction with other counsel for MGE, will act as co-counsel with Fay.

WHEREFORE, Michael M. Fay and James C. Swearengen respectfully request that the Missouri Public Service Commission grant this motion and allow Michael M. Fay to enter his appearance and represent MGE in this proceeding in conjunction with James C. Swearengen and such other counsel as MGE shall designate, and request such other and further relief as the Commission deems appropriate under the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

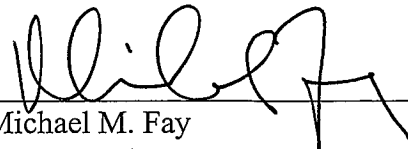
By:



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Respectfully submitted,

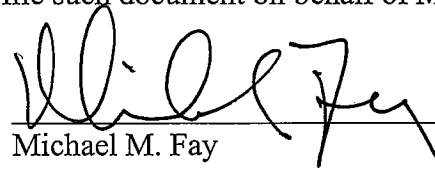
KASOWITZ, BENSON, TORRES & FRIEDMAN

By: 
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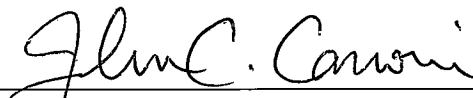
VERIFICATION

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

I, Michael M. Fay, an attorney for Missouri Gas Energy, a division of Southern Union Company, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein are true and correct to the best of my knowledge, information, and belief, and that I am authorized to file such document on behalf of Missouri Gas Energy, a division of Southern Union Company.


Michael M. Fay


Subscribed and sworn to before me this 8th day of June, 2004.


Notary Public

JOHN C. CANONI
Notary Public, State of New York
No. 02CA5029255
Qualified in Westchester County
Commission Expires August 19, 2006

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, sent electronically, or sent by facsimile transmission on this 9th day of June, 2004, to all parties of record.

A handwritten signature in cursive script, reading "Diana C. Farr". The signature is written in black ink and is positioned to the right of the text block.