BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Missouri Gas Energy's) Purchased Gas Adjustment (PGA)) Factors to be Audited in its 2002-2003) Actual Cost Adjustment.)

Case No. GR-2003-0330 et. al

MOVANTS' MOTION FOR EXTENSION OF TIME TO <u>FILE THE LIST OF ISSUES</u>

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), submits the following Motion for Extension of Time to file its List of Issues, Order of Issues, List of Witnesses, Order of Witnesses, and Order of Cross for the Commission's approval:

1. On May 5, 2006, the Commission issued an Order Adopting Procedural Schedule, setting July 25, 2006 as the due date for the List of Issues, Order of Issues, List of Witnesses, Order of Witnesses, and Order of Cross ("Issues List").

3. The Staff is still attempting to negotiate with all parties to come to a consensus on the Issues List.

5. The Staff requests an extension to July 31, 2006, pursuant to 4 CSR 240-2.050(3)(A), to file its List of Issues, Order of Issues, List of Witnesses, Order of Witnesses, and Order of Cross in this case. The Staff has been authorized to state that the Office of the Public Counsel ("OPC"), Missouri Gas Energy ("MGE"), and Enbridge Pipelines ("KPC"), by and through counsel, do not object to the requested extension. KPC agreed to a general time extension, while OPC and MGE agreed to this specific time frame.

WHEREFORE, the Staff requests, pursuant to 4 CSR 240-2.050(3)(A), an extension of time until July 31, 2006, to file its Issues List in this case.

Respectfully submitted,

/s/ Shelley E. Syler

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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 25th day of July 2006.

<u>/s/ Shelley E. Syler</u>