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Service Commission

March 19, 2003

Mr. Dale Hardy Roberts Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Re: Southern Union Company Case No. GM-2003-0238

Dear Mr. Roberts:

On behalf of Southern Union Company, I deliver herewith for filing with the Missouri Public Service Commission in the referenced matter an original and eight (8) copies of a Motion to Extend Date for Filing List of Issues.

Copies of this filing will be provided this date to all parties of record.

Would you please bring this filing to the attention of the appropriate Commission personnel.

Thank you very much for your assistance.

Very truly yours,

James C. Swearengen lan

JCS/lar Enclosures

ce: All parties of record RLJ Woodruff

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



Missouri

In the Matter of the Application of Southern ) Union Company d/b/a Missouri Gas Energy ) For Authority to Acquire Directly or )	
· · · · · · · · · · · · · · · · · · ·	) On
Indirectly, Up to and Including One Hundred ) Case No. GM-2003-0238	
Percent (100%) of the Equity Interests of )	
Panhandle Eastern Pipeline Company, )	
Including Its Subsidiaries, and to Take All )	
Other Actions Reasonably Necessary to )	
Effectuate Said Transaction )	

# MOTION TO EXTEND DATE FOR FILING LIST OF ISSUES

Comes now Southern Union Company d/b/a Missouri Gas Energy ("Southern Union"), by counsel, and for its Motion to Extend Date for Filing List of Issues states as follows to the Missouri Public Service Commission ("Commission"):

- 1. The Commission's Order Adopting Procedural Schedule issued in this matter directed, among other things, that the parties agree upon and the Staff file a List of Issues to be heard by the Commission no later than March 20, 2003.
- 2. It appears to Southern Union that the parties are close to an agreement in this matter which will resolve all issues and that the parties will be in a position to file a Stipulation and Agreement with the Commission on Friday, March 21, 2003.
- 3. In view of the foregoing, Southern Union believes that it would be appropriate for the Commission to issue its order extending the date of the filing of the List of Issues, if any, from Thursday, March 20, 2003 to Friday, March 21, 2003. Southern Union is unaware of any party that is opposed to this request.

WHEREFORE, Southern Union respectfully moves the Commission to grant the relief in paragraph 3, *supra*.

Respectfully submitted,

Dennis K. Morgan MO #24278
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Attorneys for Southern Union Company

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail or by hand delivery, on this 19th day of March 2003, to the following:

Mr. Robert Franson
Office of the General Counsel
Missouri Public Service Commission
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P.O. Box 360
Jefferson City, MO 65102-0360

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