



MISSOURI GAS ENERGY

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ROBERT J. HACK

Vice President, Pricing & Regulatory Affairs

October 15, 2003

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102-0360

FILED²

OCT 16 2003

**Missouri Public
Service Commission**

RE: Case No. GC-2004-0132

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter, please find an original and eight (8) conformed copies of Missouri Gas Energy's **Motion For Extension Of Time**.

A hard copy of this filing has been mailed or hand-delivered this date to counsel of record.

Thank you for bringing this matter to the attention of the Commission. Please call me if you have any questions regarding this matter.

Sincerely,

C: Robert Berlin
Douglas E. Micheel

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

OCT 16 2003

Missouri Public
Service Commission

The Staff of the Missouri Public Service)
Commission,)

Complainant,)

vs.)

Case No. GC-2004-0132

Missouri Gas Energy,)

Respondent.)

MOTION FOR EXTENSION OF TIME

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and in support of this motion for extension of time respectfully states the following:

1. On September 12, 2003, the Staff filed a "Gas Incident Report" ("the Incident Report") in Case No. GS-2003-0468. The Incident Report purports to relate the relevant facts surrounding an incident which occurred on March 9, 2003, at 3441 Chestnut Street in Kansas City, Missouri ("the incident").

2. Also on September 12, 2003 the Staff filed a "Complaint" against MGE regarding the same incident.

3. By "Order Directing Response" dated September 24, 2003, in Case No. GS-2003-0468, MGE was advised that its response to the Incident Report is due no later than November 12, 2003. By a "Notice of Complaint" dated September 19, 2003, in Case No. GC-2004-0132, MGE was advised that it was to file an Answer or the measures taken to satisfy the Complaint on or before October 19, 2003.

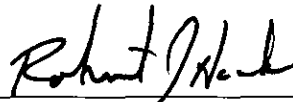
4. Inasmuch as MGE's Answer in Case No. GC-2004-0132 and MGE's Response to Incident Report in Case No. GS-2003-0468 will necessarily address very similar, if not identical,

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matters, MGE believes that the interests of efficiency would be served by allowing the filing of both pleadings at the same time, on or before November 12, 2003. Therefore, MGE requests an extension of time, until November 12, 2003, to file its Answer in Case No. GC-2004-0132. MGE does not believe that any interests will be prejudiced by this extension of time. Additionally, counsel for MGE has contacted counsel for the Commission Staff regarding this matter and no objection has been expressed.

WHEREFORE, MGE respectfully requests an extension of time, until November 12, 2003, to file its Answer herein.

Respectfully submitted,



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Attorney for Missouri Gas Energy, a division of
Southern Union Company

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was either mailed or hand delivered this 15th day of October, 2003 to:

Mr. Robert Berlin
P.O. Box 360
Jefferson City, MO 65102

Mr. Douglas E. Micheel
P.O. Box 7800
Jefferson City, MO 65102

