

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

In the matter of Missouri Gas Energy's)
Purchased Gas Cost Adjustment (PGA))
Factors to be Audited in its 2003-)
2004 Actual Cost Adjustment.)

Case No. GR-2005-0104

MOTION TO EXTEND DEADLINE FOR RESPONSE

Comes now Southern Union Company, through its Missouri Gas Energy ("MGE") division, and for its Motion, respectfully states as follows:

1. On March 8, 2006, the Commission issued an Order Directing Response directing the parties to address the question of whether this proceeding should be consolidated with Case No. GR-2003-0330. The Order set a deadline for the parties to file responsive pleadings by March 21, 2006. This pleading requests a one week extension of that deadline.

2. In support of this motion, MGE states that it needs additional time to consider the complexity of the issues posed by the Commission's question, especially since a key figure in those considerations by MGE will be unavailable for most of the period allowed in the Order.

3. MGE has discussed the substance of this motion with counsel for the other parties. Counsel for Staff, OPC, and Enbridge Pipelines have indicated to MGE that they do not oppose the extension of the deadline so long as it applies to all parties.

WHEREFORE, MGE moves that the previous deadline for responsive pleadings of March 21, 2006, be moved to March 28, 2006.

Respectfully submitted,

/s/ Gary W. Duffy

Gary W. Duffy MBE #24905
Brydon, Swearngen & England, PC
312 East Capitol Ave.
P.O. Box 456
Jefferson City, MO 65102-0456

Direct e-mail: gwduffy@comcast.net
Direct telephone: 269 979-5504

ATTORNEY FOR
MISSOURI GAS ENERGY

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 10th day of March, 2006, to:

Marc Poston
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Jeffrey A. Keevil
Stewart & Keevil
4603 John Garry Drive, Suite 11
Columbia, MO 65203

Thomas R. Schwarz, Jr./Lera Shemwell
General Counsel's Office
P.O. Box 360
Jefferson City, MO 65102

/s/ Brian McCartney

Brian McCartney