

ROBERT J. HACK Vice President, Pricing & Regulatory Affairs

June 21, 2002

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

RE: Case No. GS-2002-345

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 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, Robert Hal

C: Douglas E. Micheel Robert Franson

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of an incident in a Missouri Gas)	
Energy utility vault in Kansas City, Missouri.)	Case No. GS-2002-345

MISSOURI GAS ENERGY'S MOTION FOR EXTENSION OF TIME

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for its motion for extension of time pursuant to 4 CSR 240-2.050(4)(A) respectfully states the following:

- 1. Pursuant to the Commission's Order of May 3, 2002, the Staff of the Missouri Public Service Commission (Staff)must file its incident report by June 28, 2002. MGE personnel have been continuing to communicate with the Staff regarding this matter informally and also through the data request process. The primary reason for requesting an extension of time is to provide the Staff with sufficient time to receive and review essential information from MGE and other individuals. MGE believes that it would be helpful, for both MGE and the Staff, if the Staff would be permitted additional time to continue discussing this matter with MGE prior to the Staff's filing of its incident report.
- 2. MGE believes that an extension of approximately 60 days, until August 28, 2002, should suffice.
- 3. This matter has been discussed with counsel for the Staff and counsel for the Office of the Public Counsel and neither has expressed any objection to the request made herein.

Wherefore, MGE respectfully requests that the Commission grant an extension of

time until August 28, 2002, for the filing of the Staff's incident report.

Respectfully Submitted,

Robert J. Hack

MBE #36496

3420 Broadway

Kansas City, MO 64111

(816)360-5755

FAX: (816)360-5536

e-mail: rhack@mgemail.com

ATTORNEY FOR MISSOURI GAS ENERGY

Robert Hack

Certificate of Service

I hereby certify that a copy of the foregoing document was mailed or hand delivered this 21st day of June, 2002, to:

Douglas E. Micheel Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Robert Franson Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102