BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Application of Missouri Gas)	
Energy, a division of Southern Union Company)	Case No. GU-2005-0095
for an Accounting Authority Order Concerning the)	
Kansas Property Tax for Gas in Storage.)	

MOTION TO RESCHEDULE HEARING

COMES NOW Missouri Gas Energy, a division of Southern Union Company (MGE or Company), and as its motion to reschedule the hearing in this matter, states the following to the Missouri Public Service Commission (Commission) concerning the procedural schedule:

- 1. On December 16, 2004, the Commission issued its Order Adopting Procedural Schedule. This Order, among other things, set this case for hearing on February 24 and 25, 2005.
- 2. MGE now has a witness availability issue in that its witness will be out of town and unavailable for hearing on February 24 and 25, 2005. Accordingly, MGE hereby moves the Commission to reschedule this hearing for March 8 and 9, 2005.
- 3. The undersigned has discussed this matter with counsel for the Commission Staff, the Office of the Public Counsel and the Midwest Gas Users Association. Counsel for these parties have all indicated to the undersigned that they have no objection to this motion.

WHEREFORE, MGE respectfully requests that the Commission issue its order rescheduling the hearing for March 8 and 9, 2005.

Respectfully-submitted,

Dean L. Cooper

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ATTORNEYS FOR MISSOURI GAS ENERGY, A DIVISION OF SOUTHERN UNION COMPANY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on January 20, 2005, to the following:

Mr. Thomas Schwarz Office of the General Counsel Governor Office Building, 8th Floor Jefferson City, Mo 65101

Mr. Stuart Conrad Finnegan, Conrad & Peterson, L.C. 1209 Penntower Office Center 3100 Broadway Kansas City, Missouri 64111 Mr. Douglas Micheel Office of the Public Counsel Governor Office Building, 6th Floor Jefferson City, MO 65101