



MISSOURI GAS ENERGY

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ROBERT J. HACK

Vice President, Pricing & Regulatory Affairs

October 2, 2002

FILED
OCT 03 2002
Missouri Public
Service Commission

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. GC-2003-0076

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**.

Also enclosed is a floppy disk containing this document for filing on EFIS.

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 Franson
Douglas E. Micheel

Enclosures

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

The Staff of the Missouri Public Service)
Commission,)
Complainant,)
)
vs.)
)
Missouri Gas Energy,)
Respondent.)

Case No. GC-2003-0076

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MISSOURI GAS ENERGY'S MOTION FOR EXTENSION OF TIME

Come now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for this motion for extension of time respectfully state as follows:

1. On August 28, 2002, the Staff filed a "Gas Incident Report" ("the Incident Report") in Case No. GS-2002-345. Also on August 28, 2002 the Staff filed a "Complaint" against MGE alleging violation of certain Missouri Public Service Commission ("Commission") rules. The Complaint and the Incident Report involve the same incident.

2. By "Notice" dated September 16, 2002, in Case No. GS-2002-345, MGE was advised that its response to the Incident Report is due no later than October 28, 2002. By a "Notice of Complaint" dated September 4, 2002, in Case No. GC-2003-0076, MGE was advised that it was to file an Answer or the measures taken to satisfy the Complaint on or before October 4, 2002.

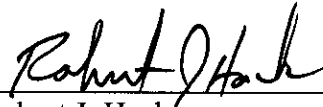
3. MGE has been engaged in discussions with the Staff regarding both the Complaint and the Incident Report. MGE believes that it is close to reaching an agreement with the Staff that would resolve the matters raised by the Staff in both the Complaint and the Incident Report. However, MGE does not believe it will be able to finalize the agreement by October 4, 2002 (the deadline for filing an Answer or the measures taken to satisfy the Complaint). MGE

believes time would be more productively spent working on an agreement instead of an Answer. Therefore, MGE respectfully requests an extension of time, until October 28, 2002, to file an Answer or the measures taken to satisfy the Complaint. Granting this extension of time should not prejudice any party's interests.

4. Counsel for the Staff and the Office of the Public Counsel have been apprised of the contents of this pleading and have expressed no objection.

WHEREFORE, MGE respectfully request that the Commission grant it an extension of time, until October 28, 2002, to file an Answer or the measures taken to satisfy the Complaint.

Respectfully submitted,



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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 2nd day of October, 2002 to:

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

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

