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September 25, 2000

Mr. Dale Hardy Roberts
Executive Secretary
Public Service Commission
Governor State Office Building
Jefferson City, MO

RE: Case No. GO-2000-624

Missouri Gas Energy application

FILED² SEP 2 5 2000

Missouri Public Service Commission

Dear Mr. Roberts:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN CHARLES E. SMARR

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Motion for Extension of Time.

If you have any questions, please give me a call.

Sincerely yours,

Gary W. Duffy

Enclosures

cc: Of

Office of Public Counsel

Dennis Frey, Office of the General Counsel

BEFORE THE PUBLIC SERVICE COMMISSION FILED²
OF THE STATE OF MISSOURI

SEP 2 5 2000

In the matter of the application of Missouri Gas Energy, a division of Southern Union Company,)	Service Commission
for the issuance of an accounting authority order relating to environmental activities.))	Case No. GO-2000-624

MOTION FOR EXTENSION OF TIME TO RESPOND

COMES NOW Missouri Gas Energy ("MGE" or "Company"), a division of Southern Union Company ("Southern Union"), and moves for an extension of time in which to respond to the Staff recommendation in this case. In support thereof, MGE respectfully states as follows:

- 1. MGE received the Staff recommendation on September 18, 2000, although it was filed on September 15. The recommendation is ten pages of single-spaced information.
- 2. MGE filed its application on April 5, 2000. Therefore, it took the Staff approximately five and a half months to produce its recommendation. MGE is studying the recommendation but is not yet in a position to respond, if a response is considered due ten days from the filing date pursuant to 4 CSR 240-2.080(16). MGE believes it will be able to respond by October 16.

WHEREFORE, MGE requests that it be allowed until October 16, 2000 to file a response to the Staff recommendation.

Respectfully submitted,

Gary W. Duffy

MBE #24905

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Attorneys for Missouri Gas Energy

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served via hand delivery this 25th day of September, 2000, upon:

The Office of the Public Counsel Governor Office Building Jefferson City, Missouri Dennis Frey, Office of the General Counsel Missouri Public Service Commission Governor Office Building

1 Jan. (

Jefferson City, Missouri

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