

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

In the Matter of the Application of Southern)	
Union Company d/b/a Missouri Gas Energy)	
for Authority to Acquire Directly or Indirectly,)	
up to and Including Fifty Percent (50%) of)	Case No. GO-2005-0019
the Equity Interests of CrossCountry Energy,)	
LLC, and to Take All Other Actions)	
Reasonably Necessary to Effectuate Said)	
Transaction)	

**MOTION FOR EXTENSION OF TIME FOR THE STAFF OF THE COMMISSION
TO FILE ITS RECOMMENDATION AND FOR EXPEDITED CONSIDERATION**

Comes now Southern Union Company ("Southern Union" or "Company"), applicant in the captioned matter, and requests that the Commission grant to its Staff an extension of time within which to file its recommendation in this case by six (6) days to August 19, 2004.

1. By order dated July 20, 2004, the Commission directed its Staff to state by July 23, 2004 whether it would be in a position to file a memorandum and recommendation in this case by August 16, 2004. On July 23, 2004, Staff filed its response stating that its ability to file a recommendation by August 16, 2004 was "contingent upon receipt of prompt and complete responses from MGE/Southern Union to the Staff's data requests."

2. In its review of the Application in this case, Staff has requested information from Southern Union and Missouri Gas Energy ("MGE") in the form of data requests in culminating in a telephonic interview of various Company personnel on August 9, 2004. As a result of those interviews, Staff requested, and Southern Union/MGE has provided,

additional documentation to the Staff and the Office of the Public Counsel (“OPC”) which Southern Union understands that Staff is still in the process of reviewing.

3. In the meantime, representatives of Southern Union, MGE and Staff have had preliminary discussions which may form the basis of an agreement as to insulating conditions pursuant to which the Commission could issue an order approving the Application.

4. Staff has requested, and Southern Union supports, additional time for Staff to review the documentation with which it recently has been provided and, also, to give Southern Union, Staff and OPC an opportunity to discuss the submission of a settlement for the Commission’s consideration.

5. Under the circumstances, Southern Union requests that the Commission give its Staff an extension of six (6) days until Thursday, August 19 in which to file a stipulation or, alternatively, its recommendation. Although this extends the time for filing Staff’s recommendation, Southern Union is hopeful that it will obviate the need for Southern Union to review and file a response to a Staff recommendation and therefore lead to the submission of this matter in a shorter overall timeframe.

6. The request for an extension of time for Staff to file its recommendation in this case has been discussed by Staff with OPC and it is Southern Union’s understanding that OPC has no objection to this request.

7. Southern Union requests this matter be given expedited consideration because the current deadline for Staff to file a recommendation is tomorrow, August 16, 2004. No party objects to the request. The primary purpose of the request is to give the parties to the case time to discuss the issues and resolve them.

WHEREFORE, Southern Union, for good cause shown, requests the Commission grant its Staff an extension of time of six (6) days until Thursday, August 19, 2004 to file a stipulation in this case or, alternatively, its recommendation.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail or by hand delivery, on this 12th day of August 2004 to the following:

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