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November 21, 2001

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WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. KOLILIS
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GR-2001-382

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR EXTENSION OF TIME AND FOR EXPEDITED TREATMENT.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Thomas R. Schwarz, Jr.
Deputy General Counsel
(573) 751-5239
(573) 751-9285 (Fax)

TRS:sw
Enclosure
cc: Counsel of Record

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

FILED²
NOV 21 2001
Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment Tariff)
Revisions to be Reviewed in Its 2000-)
2001 Actual Cost Adjustment.

Case No. GR-2001-382

MOTION FOR EXTENSION OF TIME AND FOR

EXPEDITED TREATMENT

In support of its Motion for Extension of Time and for Expedited Treatment, Staff states:

1. The Commission established this case for the purpose of reviewing the natural gas costs of Missouri Gas Energy, a division of Southern Union Company (MGE) for the 2000-2001 Actual Cost Adjustment (ACA) period. Following the extraordinarily cold months of November and December 2000, and the record high prices of natural gas, the Commission set this case on an accelerated procedural schedule.

2. The Commission ordered that Staff file its memorandum and recommendation in this case on November 29, 2001.

3. Staff hired a consultant, Mr. John Herbert, to assist in evaluating the ACA cases, and in particular the hedging practices of Missouri local distribution companies (LDCs). In proposing procedural schedules to the Commission, the Staff had anticipated that the consulting contract would be awarded by June 1, 2001, and that Staff would be able to promptly provide all the data that Mr. Herbert might need, in the format he would need.

4. Award of the contract was delayed to permit vendors to analyze and prepare proposals on either a turn-key basis (providing the entire ACA audit), or on a more limited basis (providing only hedging review services). This amendment to the RFP delayed award of the

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contract and other procedural matters such as obtaining non-disclosure statements resulted in additional delays to Mr. Herbert starting his work under the contract.

5. Further complicating and delaying the process, the LDCs provided data to Staff in a variety of formats. Staff has had to rework the formatting of this data and research past responses to provide Mr. Herbert with a consistent database from which to complete his work.

6. As the Commission is also aware, Mr. Michael J Wallis has resigned from service with the Commission. Mr. Wallis was a senior auditor in the Procurement and Analysis Department, having served the Commission as a Certified Public Accountant for more than 15 years, and was one of only three auditors in the Procurement Analysis group. Mr. Wallis had been assigned to the audits of Laclede Gas Company, Missouri Gas Energy, and Atmos. He was not able to complete the 2000-2001 ACA audits prior to leaving and, in his absence, the remaining Staff will not be able to complete the work on these cases as ordered by the procedural schedule.

7. Staff, therefore, respectfully requests that the Commission grant an extension of time until March 28, 2002, for Staff to file its Memorandum in this case.

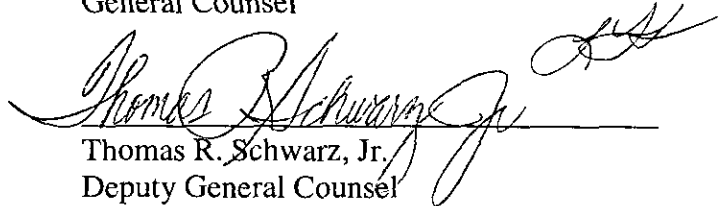
8. Because of the press of time on the Procurement Analysis Staff, Staff respectfully requests that the Commission address this motion on an expedited basis.

9. This filing was made promptly after it was discovered that additional time would be required to complete the gas cost audit and analysis in this case.

WHEREFORE, Staff respectfully requests that the Commission consider this motion on an expedited basis, and grant Staff until March 28, 2002 to file its recommendation in this case. Granting this motion will allow Staff and Staff's consultant the time to complete its work and should have no adverse impact on consumers.

Respectfully submitted,

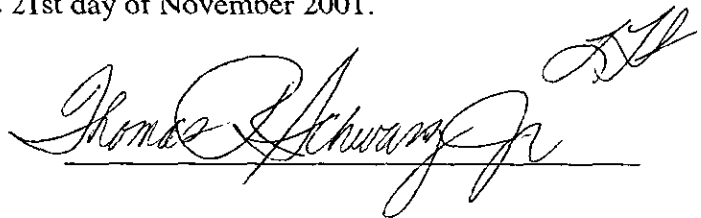
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 21st day of November 2001.


Thomas R. Schwarz, Jr.

**Service List for
Case No. GR-2001-382
Revised: November 21, 2001 (SW)**

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