

LAW OFFICES  
**BRYDON, SWEARENGEN & ENGLAND**  
PROFESSIONAL CORPORATION

DAVID V.G. BRYDON  
JAMES C. SWEARENGEN  
WILLIAM R. ENGLAND III  
JOHNNY K. RICHARDSON  
GARY W. DUFFY  
PAUL A. BOUDREAU  
SONDRA B. MORGAN  
CHARLES E. SMARR  
MARK G. ANDERSON  
DEAN L. COOPER  
TIMOTHY T. STEWART  
GREGORY C. MITCHELL  
RACHEL M. CRAIG  
BRIAN T. MCCARTNEY  
DALE T. SMITH

312 EAST CAPITOL AVENUE  
P.O. BOX 456  
JEFFERSON CITY, MISSOURI 65102-0456

AREA CODE 573  
TELEPHONE 635-7166  
FACSIMILE 634-7431

July 20, 1999

**FILED**

JUL 20 1999

Missouri Public  
Service Commission

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

Re: Southern Union Company

49  
GM-2000-~~13~~

Dear Mr. Roberts:

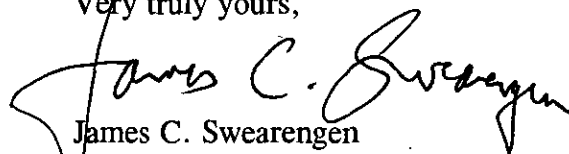
On behalf of Southern Union Company please find enclosed for filing with the Missouri Public Service Commission an original and fourteen (14) copies of a Motion for Expedited Consideration.

A copy of this filing will be provided to the Office of the Public Counsel.

Would you please bring this filing to the attention of the appropriate Commission personnel.

Thank you for your assistance in this matter.

Very truly yours,

  
James C. Swearengen

JCS/jlh  
Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JUL 20 1999

Missouri Public  
Service Commission

In the matter of the application of )  
Southern Union Company for authority )  
to acquire up to and including five percent )  
(5%) of the common stock of Pennsylvania )  
Enterprises, Inc. )

Case No. GM- 2000-49

**MOTION FOR EXPEDITED CONSIDERATION**

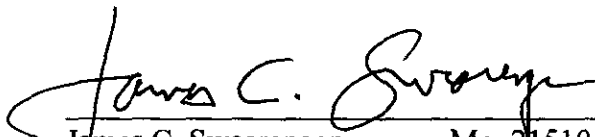
COMES NOW Southern Union Company ("Southern Union"), by counsel, and for its Motion for Expedited Consideration respectfully states to the Missouri Public Service Commission ("Commission") as follows:

1. Southern Union has this date caused to be filed with the Commission an application which is the subject of the captioned matter. The application requests an order of the Commission authorizing Southern Union to acquire up to and including five percent (5%) of the common stock of Pennsylvania Enterprises, Inc. ("PNT").

2. As explained in the application, the purpose of the investment authority is to mitigate the pricing effect of possible arbitrage trading in PNT shares prior to the time of closing of the merger and thus to preserve the value of the merger. Accordingly, time is of the essence. Arbitrage trading in PNT stock may already be occurring and will likely increase in intensity as the time of pricing approaches.

WHEREFORE in view of the foregoing, Southern Union respectfully moves the Commission to give the subject application expedited consideration and to issue an order approving the application effective July 30, 1999.

Respectfully submitted,

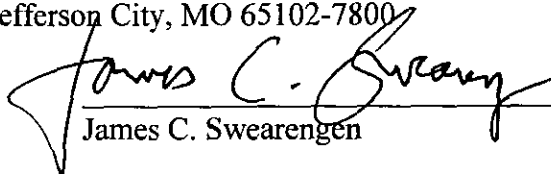
  
James C. Swearengen Mo. 21510  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 E. Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102-0456

Attorney for  
SOUTHERN UNION COMPANY

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 20th day of July, 1999, to:

The Office of the Public Counsel  
Truman Building, Room 250  
P.O. Box 7800  
Jefferson City, MO 65102-7800

  
James C. Swearengen