

**BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of the Application of Missouri Gas Energy,    )  
a Division of Southern Union Company, for a Certificate    )  
of Public Convenience and Necessity Authorizing it to    )  
Construct, Install, Own, Operate, Control, Manager and    ) Case No. GA-2007-0289  
Maintain a Natural Gas Distribution System to Provide    )  
Gas Service in Platte County, Missouri, as an Expansion    )  
Of its Existing Certified Area                                    )

**MOTION FOR ADDITIONAL TIME TO  
RESPOND TO APPLICATION TO INTERVENE**

COMES NOW Missouri Gas Energy, a division of Southern Union Company (MGE) by  
and through its counsel, and states:

1. MGE filed an application for a certificate of public convenience and necessity on January 31, 2007.
2. On February 2, 2007, the Commission provided notice of the application and set a deadline for intervention requests.
3. Empire District Gas Company (EDG) filed an application to intervene on February 21, 2007.
4. Under 4 CSR 240-2.080(15) MGE has ten days to respond to EDG's pleading unless otherwise ordered by the Commission.
5. MGE requests until March 9, 2007 to respond to EDG's application to intervene. MGE has recently hired outside counsel to assist it in this matter and outside counsel needs additional time to review the assertions made in EDG's pleading. Counsel for EDG has indicated that it has no objection to MGE's request for extension of time.

WHEREFORE, MGE requests that the Commission grant it an extension to respond to EDG's application to intervene until March 9, 2007.

Respectfully submitted,

/s/ Roger W. Steiner

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Attorney for Missouri Gas Energy

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was emailed to the following counsel this 2nd day of March, 2007:

Office of the General Counsel  
Missouri Public Service Commission  
Governor State Office Building  
Jefferson City, Missouri 65101

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/s/ Roger W. Steiner

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