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September 6, 2000

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Director, Utility Services

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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

FILED²
SEP 6 2000

Missouri Public
Service Commission

RE: Case No. GE-2000-808

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR AN EXTENSION OF TIME TO FILE STAFF RECOMMENDATION.**

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,

Lera L. Shemwell
Associate General Counsel
(573) 751-7431
(573) 751-9285 (Fax)

LLS:sw
Enclosure
cc: Counsel of Record

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

In the Matter of the filing of Missouri Gas
Energy, a division of Southern Union
Company, pursuant to 4 CSR 240-
40.017(8).

)
) Case No. GE-2000-808
)
)

FILED²

SEP 6 2000

Missouri Public
Service Commission

**MOTION FOR AN EXTENSION OF TIME TO FILE
STAFF RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion for Extension of Time to file Staff Recommendation, states as follows:

1. On June 7, 2000, Missouri Gas Energy (MGE) filed its request for an exemption from the requirements of 4 CSR 240-40.017 (the HVAC rule) pursuant to subsection (8) of that rule. In its filing, MGE noted that it has challenged the lawfulness of this rule, and did not acquiesce to the lawfulness of the rule by making this filing. However, Staff would note that the HVAC rule is currently effective for all regulated gas corporations operating in Missouri.

2. On June 22, 2000, Staff sent MGE a data request seeking information necessary for Staff to make a recommendation to the Commission concerning MGE's request for waiver.

3. On August 9, 2000, the Commission issued its Order Directing Filing in which it ordered the Staff to file its recommendation in the case no later than September 8, 2000.

4. Since the original data request was sent, the Staff has made additional requests for information and, while some information has been received, Staff has not received adequate information to make a recommendation that MGE be granted its requested waiver.

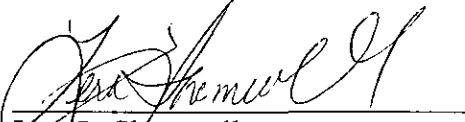
5. MGE has committed to providing the information requested to the Staff no later than September 15, 2000.

6. Staff requests an Extension of Time in which to file its Recommendation in this case. MGE agrees with the request for extension and the Office of the Public Counsel does not object to this request.. No one will be prejudiced by the grant of additional time in which to file.

WHEREFORE, Staff respectfully requests the Commission grant an extension of time until September 29, 2000 for Staff to file its Recommendation in this case

Respectfully submitted,

DANA K. JOYCE
GENERAL COUNSEL

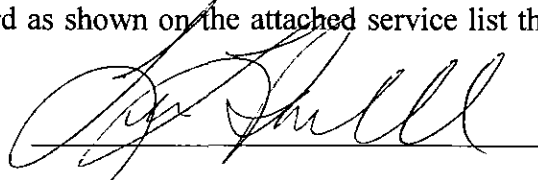


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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed via first class mail, postage prepaid, or hand-delivered to all counsel of record as shown on the attached service list this 6th day of September, 2000.



**Service List for
Case No. GE-2000-808
September 6, 2000**

**Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102**

**Robert J. Hack
Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111**