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October 1, 1999

FILED³
OCT 0 1 1999

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

Missouri Public Service Commission

Re: Southern Union Company/Pennsylvania Enterprises Merger Case No. GM-2000-43

Dear Mr. Roberts:

DAVID V.G. BRYDON

GARY W. DUFFY

DEAN COOPER

PAUL A. BOUDREAU

SONDRA B. MORGAN

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

On behalf of Southern Union Company, I deliver herewith an original and fourteen (14) copies of a Motion to Extend Time for Filing of Recommendations for filing with the Commission in the referenced matter. I would appreciate it if you would see that the copies are distributed to the appropriate Commission personnel. Copies are being hand-delivered to The Office of the Public Counsel and the General Counsel's Office this date.

I have enclosed an extra copy of the document which I request that you stamp "Filed" and return to the person delivering it to you.

Thank you for your attention in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

James C. Swearengen

JCS/aw Enclosures

cc: The Office of the Public Counsel General Counsel's Office

FILED³
OCT 0 1 1999

STATE OF MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)	Service Commission
Southern Union Company for authority)	
to acquire and merge with Pennsylvania)	Case No. GM-2000-43
Enterprises Inc., and, in connection therewith,)	
certain other related transactions.)	

MOTION TO EXTEND TIME FOR FILING OF RECOMMENDATIONS

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

- 1. By its Notice issued August 2, 1999, the Commission directed its Staff to file Staff recommendations regarding approval or rejection of the subject application no later than October 1, 1999.
- 2. Since the filing of its application, representatives of Southern Union have been engaged in settlement discussions with representatives of the Staff and representatives of The Office of the Public Counsel. Those settlement discussions continue and it is hoped by Southern Union that they will lead to a stipulated resolution of the application, thus eliminating the necessity of a Staff recommendation.
- 3. Accordingly, to provide the Staff, The Office of the Public Counsel and Southern Union with additional time to complete their discussions, Southern Union desires that the Commission issue its Notice extending the deadline for the Staff recommendations from Friday, October 1, 1999, to 3 p.m. Friday, October 8, 1999, in the event that a stipulated resolution is not filed by Wednesday, October 6, 1999.
- 4. Counsel for the Staff and the Office of the Public Counsel are aware of the contents of this pleading and support the relief requested in paragraph number 3.

WHEREFORE, Southern Union moves for the relief requested in paragraph number 3, supra.

Respectfully submitted,

James C. Swearengen

#215 0

Paul A. Boudreau

#33155

BRYDON, SWEARENGEN & ENGLAND P.C.

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Attorneys 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 1st day of October 1999, to:

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