

ROBERT J. HACK Vice President, Pricing & Regulatory Affairs

April 15, 2002

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102-0360

RE: Case No. GS-2002-345, Missouri Gas Energy

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter, please find an original and eight (8) conformed copies of Missouri Gas Energy's Motion for Extension of Time.

A copy of this filing has been mailed or hand-delivered this date to counsel of record.

Thank you for bringing this matter to the attention of the Commission. Please call me if you have any questions regarding this matter.

Robert J. Hack by Kury

Douglas E. Micheel Robert Franson

Enclosures

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of an incident in a Missouri Gas)	
Energy utility vault in Kansas City, Missouri.)	Case No. GS-2002-345

MISSOURI GAS ENERGY'S MOTION FOR EXTENSION OF TIME

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for its motion for extension of time pursuant to 4 CSR 240-2.050(4)(A) respectfully states the following:

- 1. According to the Order Establishing Case issued herein by the Commission on January 23, 2002, the Staff of the Missouri Public Service Commission is to file its incident report within 120 days thereof, or by approximately May 23, 2002. MGE personnel have been communicating with the Staff regarding this matter informally and also through the data request process. Some of MGE's responses to certain Staff data requests were delayed due to a previously scheduled vacation of the individual at MGE responsible for coordinating MGE's responses as well as the amount and complexity of the information requested.
- 3. As a consequence, MGE understands that the Staff needs an extension until June 28, 2002 to file its incident report and hereby seeks this extension.
- 4. This matter has been discussed with counsel for the Staff and counsel for the Office of the Public Counsel and neither has expressed any objection to the request made herein.

Wherefore, MGE respectfully requests that the Commission grant an extension of

time until June 28, 2002, for the filing of the Staff's incident report.

Respectfully Submitted,

Robert J. Hack

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Robert Hack

ATTORNEY FOR MISSOURI GAS ENERGY

Certificate of Service

I hereby certify that a copy of the foregoing document was mailed or hand delivered this 15^{th} day of April, 2002, to:

Douglas E. Micheel Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Robert Franson Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102