

In re: FERC Docket No. CP07-450,)
MoGas Request for Authorization) Case No. GO-2009-0094
under Blanket Certificate)

COMES NOW Applicant MoGas Pipeline LLC (“MoGas”) and states as follows.

2. The general authority of the Commission to intervene through outside counsel in FERC cases has been challenged, as has the Commission's specific intervention in two related but distinct FERC cases as to which Applicant is a party.

4. The Commission's General Counsel has filed a pleading suggesting that this action is moot and should be dismissed because one of the two FERC cases at issue has concluded.

JCDOCS 29159v1

6. Applicant's First Amended Application to Terminate is being filed concurrently with this motion for leave.

WHEREFORE, MoGas moves for leave to file its First Amended Application to Terminate.

Respectfully submitted,

LATHROP & GAGE, L.C.

/s/ David G. Brown

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 5th day of February, 2009, to:

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/s/ David Brown