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## Missouri Public Service Commission

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March 27, 2002

ROBERT J. QUINN, JR. Executive Director

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ROBERT SCHALLENBERG Director, Utility Services

DONNA M. PRENGER Director, Administration

DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> 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

RE: Case No. GR-2001-382

FILED<sup>2</sup>

MAR 2 7 2002

Missouri Public Service Commission

Dear Mr. Roberts:

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

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,

Thomas R. Schwarz, Jr.
Deputy General Counsel

(573) 751-5239

(573) 751-9285 (Fax)

TRS:sw Enclosure

cc: Counsel of Record

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



| Service C | uri Public<br>Commission |
|-----------|--------------------------|
|-----------|--------------------------|

| In the matter of Missouri Gas Energy's | ) |                      |
|--|---|----------------------|
| Purchased Gas Adjustment tariff        | ) |                      |
| Revisions to be reviewed in its 2000 - | ) | Case No. GR-2001-382 |
| 2001 Actual Cost Adjustment.           | ) |                      |

## MOTION FOR EXTENSION OF TIME

COMES NOW Staff of the Public Service Commission of Missouri and asks the Commission to grant an extension of time for the filing of Staff's recommendation in this case until April 12, 2002. In support of its motion Staff states:

- 1. This case was established to review Missouri Gas Energy, a division of Southern Union Company's natural gas costs for the Actual Cost Adjustment period of July 1, 2000 through June 30, 2001.
- 2. The ACA period under review contains a period of significant increases in the price of natural gas, as well as the coldest November and December on record in Missouri. Staff believes that the opportunity to discuss its possible adjustments to MGE's ACA balances prior to filing the recommendation would be of value to all parties and to the Commission.
- 3. MGE, the Office of the Public Counsel, the City of Joplin, and Kansas Pipeline Company have agreed to this limited extension. The parties will discuss any needed additional adjustments to the procedural schedule, and advise the Commission promptly.



WHEREFORE, Staff asks the Commission to grant it an extension until April 12, 2002 to file its recommendation in this case.

Respectfully submitted,

DANA K. JOYCE General Counsel

Thomas R. Schwarz, Jr. Deputy General Counsel Missouri Bar No. 29645

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Thomas R. Schwang Jr.

Thomas R. Schwan

## **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 27<sup>th</sup> day of March, 2002.

Service List for Case No. GR-2001-382 Revised: March 27, 2002 (SW)

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