

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

In the Matter of Missouri Gas Energy's	)	
Tariffs to Implement a General Rate	)	Case No. GR-2004-0209
Increase for Natural Gas Service	)	

**MOTION TO ADMIT PRO HAC VICE**

COMES NOW Eric Daniel Herschmann ("Herschmann"), on behalf of Missouri Gas Energy, a division of Southern Union Company ("MGE"), and, pursuant to 4 CSR 240-2.040(3)(C), respectfully states as follows to the Missouri Public Service Commission:

1. On November 4, 2003, MGE filed with the Commission tariff sheets designed to increase its rates for natural gas service. The proposed tariff sheets bear an effective date of December 4, 2003. By its Order of November 7, 2003, the Commission suspended MGE's proposed tariff, and the Commission thereafter established a procedural schedule.

2. Herschmann seeks to enter his appearance herein on behalf of MGE and represent MGE in certain aspects of this proceeding.

3. Herschmann is employed by the law firm of Kasowitz, Benson, Torres & Friedman located at 1633 Broadway, New York, NY, 10019. Herschmann is not a member of the Missouri Bar, but is a member in good standing of the New York Bar.

4. Herschmann's New York federal bar number is EH-7460. Neither Herschmann nor any member of the firm of Kasowitz, Benson, Torres & Friedman is disqualified to appear in any court in New York.

5. James C. Swearengen of the law firm of Brydon, Swearengen & England, P.C., is a member in good standing of the Missouri Bar and has an office at 312 E. Capitol Ave., P.O. Box 456, Jefferson City, Missouri, 65102.

6. Swearengen has entered his appearance herein on behalf of MGE and, in conjunction with other counsel for MGE, will act as co-counsel with Herschmann.

WHEREFORE, Eric Daniel Herschmann and James C. Swearengen respectfully request that the Missouri Public Service Commission grant this motion and allow Eric Daniel Herschmann to enter his appearance and represent MGE in this proceeding in conjunction with James C. Swearengen and such other counsel as MGE shall designate and request such other and further relief as the Commission deems appropriate under the circumstances.

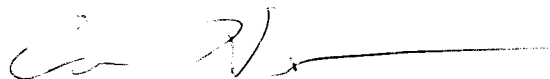
Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 

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Respectfully submitted,



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**VERIFICATION**

STATE OF NEW YORK     )  
                                  ) ss.  
COUNTY OF NEW YORK)

I, Eric Daniel Herschmann, an attorney for Missouri Gas Energy, a division of Southern Union Company, being duly sworn upon my oath, do hereby state that I have read the foregoing document and that the facts stated therein are true and correct to the best of my knowledge, information, and belief, and that I am authorized to file such document on behalf of Missouri Gas Energy, a division of Southern Union Company.

Eric Daniel Herschmann

Subscribed and sworn to before me this 26<sup>TH</sup> day of MARCH, 2004.

  
Notary Public

ANA V. GARCIA  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 01GA5047666  
QUALIFIED IN QUEENS COUNTY  
COMMISSION EXPIRES AUGUST 07, 2005

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered or mailed by U.S. mail on this 15<sup>TH</sup> day of April, 2004, to all parties of record.

