BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Missouri Gas Energy's)	
2006-2007 Actual Cost Adjustment)	Case No. GR-2007-0256

MGE'S MOTION FOR EXTENSION

COMES NOW Missouri Gas Energy (MGE), a division of Southern Union Company, by and through counsel, and, pursuant to Missouri Public Service Commission (Commission) Rule 4 CSR 240-2.050(3), respectfully states as follows to the Commission:

- 1. On December 15, 2008, the Staff of the Commission filed a recommendation and memorandum based on Staff's review of MGE's 2006-2007 Actual Cost Adjustment (ACA) filing (Staff Recommendation).
- 2. On January 9, 2009, MGE filed its Motion for Extension wherein it requested that it be given until February 13, 2009, to respond to the Staff Recommendation. The Commission granted this motion by its Order Extending Time to Respond to Staff's Recommendation, issued January 13, 2009.
- 3. Thereafter, on January 23, 2009, the Staff filed a pleading entitled Recommendation Case Remain Open Pending Further Investigation. This pleading indicated that: 1) MGE had informed Staff about a billing issue that might have an impact on Staff's Recommendation; 2) Staff and MGE were discussing the billing issue; and, 3) Staff requested the Commission leave this case open pending completion of the Staff's investigation into this matter to determine whether Staff will need to amend its recommendation for this ACA period. The pleading further indicated that MGE had no objection to Staff's request.
- 4. The discussions between Staff and MGE referenced in Staff's Recommendation

 Case Remain Open continue at this time. Accordingly, the potential for an amendment of the

Staff Recommendation still exists. MGE believes that under these circumstances a response to Staff's original Recommendation would serve no purpose and therefore asks that the date for MGE to respond to the Staff Recommendation be further extended until such time as Staff has determined whether or not it will amend its Staff Recommendation in this case.

- 5. Accordingly, MGE requests that the Commission grant it an extension of time to respond to the Staff Recommendations until a date after Staff has notified the Commission as to whether or not it will amend its Staff Recommendation in this case.
 - 6. Staff Counsel has indicated that Staff has no objection to the requested extension.

WHEREFORE, MGE respectfully requests that the Commission issue its order granting MGE a further extension to respond to the Staff Recommendation filed on December 15, 2008.

Respectfully Submitted,

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ATTORNEYS FOR MISSOURI GAS ENERGY, A DIVISION OF SOUTHERN UNION COMPANY

Certificate of Service

I hereby certify that two, true and correct copies of the above and foregoing document was sent by electronic mail on this 13^{th} day of February, 2009, to:

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