## 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 indicating that Staff has reviewed the 2006-2007 Actual Cost Adjustment (ACA) filing of Missouri Gas Energy, a Division of Southern Union Company. Staff offered various recommendations concerning MGE's purchasing and operating decisions.
- On December 16, 2008, the Commission issued its Order Directing Response, wherein the Commission directed MGE to respond to Staff's recommendations by January 14, 2009.
- 3. MGE would like to discuss with Staff and clarify the various Staff recommendations prior to responding to the Staff recommendation and memorandum. Because of the intervening holidays and associated issues related to personnel availability, MGE has been unable to accomplish this as of this date.
- 4. Accordingly, MGE requests that the Commission grant it a thirty (30) day extension of time, or until February 13, 2009, to respond to the Staff recommendations.
  - 5. 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 thirty (30) day extension, or until February 13, 2009, to respond to the Staff recommendations.

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 9<sup>th</sup> day of January, 2009, to:

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