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## Missouri Public Service Commission

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September 18, 2000

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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-99-392

SEP 1 8 2000

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 TO FILE RESPONSE.

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

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TRS:sw Enclosure

cc: Counsel of Record

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



In the Matter of Associated Natural Gas Company's Purchased Gas Adjustment Factors to be reviewed in its 1998-1999	)	Case No. GR-99-392
Actual Cost Adjustment	1	

## MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission"), and for its motion for extension of time states as follows:

- 1. Staff filed its Recommendation in this case on August 1, 2000. Associated Natural Gas Company ("ANG") filed its Response to the Staff's recommendation on September 8, 2000.
- 2. In its Response, Associated noted that Staff had recommended ANG undertake certain reporting requirements, and suggested that such reports might be better addressed by Atmos Energy Corporation, the current operator of ANG's former Missouri properties.
- 3. Staff is in the process of discussing this issue further with both ANG and Atmos. Staff requests that it be granted an extension of time, until October 18, 2000, to formulate its response in light of these ongoing discussions.
- 4. Because ANG and Staff agree that further action in this docket should await the results of judicial review of prior ANG ACA cases, this extension of time will prejudice no party.

Respectfully submitted,

DANA K. JOYCE General Counsel

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

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Thomas R. Schwarz

## 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 18<sup>th</sup> day of September, 2000.

Service List for Case No. GR-99-392 Revised: September 18, 2000 (SW)

Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

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