

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

In the Matter of Missouri Gas Energy)	
Concerning a Natural Gas Incident)	Case No. GS-2007-0381
At 1706 Smith Street, Blue Springs,)	
Missouri.)	

The Staff of the Missouri Public Service)	
Commission,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2008-0026
)	
Missouri Gas Energy,)	
)	
Respondent.)	

MOTION FOR CONSOLIDATION AND MOTION FOR EXTENSION

COMES NOW Missouri Gas Energy, a Division of Southern Union Company (MGE), and, as its Motion for Consolidation and Motion for Extension, states as follows to the Missouri Public Service Commission (Commission):

BACKGROUND

1. On April 12, 2007, the Commission established a case for the purpose of receiving the Commission Staff's report concerning a natural gas incident in Blue Springs (Case No. GS-2007-0381). On July 23, 2007, the Staff's Report Concerning Its Investigation of Gas Safety Incident was filed. That Report suggested that Empire be required to file a response within thirty days of the filing of the Report (or by August 22, 2007).

2. On July 24, 2007, the Staff filed a Complaint against MGE concerning the same natural gas incident in Blue Springs (Case No. GC-2008-0026). The

Commission's Notice of Complaint provided MGE thirty (30) days from the date of that notice to file an answer or notice that the complaint has been satisfied (or until August 25, 2007).

MOTION FOR CONSOLIDATION

3. Commission Rule "4 CSR 240-2.110(3) allows the Commission to consolidate pending actions involving related questions of law or fact." Order Consolidating Cases, *In the Matter of the Application of Oakview Water and Sewer Company, LLC*, Case No. WA-2007-0201 (December 4, 2006).

4. As the cited cases concern a single natural gas incident, there are common questions of law and fact in the above-referenced cases and the consolidation of Cases Nos. GS-2007-0381 and GC-2008-0026 would be administratively expedient in that it would simplify the filings to be made by parties to these matters.

MOTION FOR EXTENSION

5. As indicated above, MGE has a response and an answer due in the referenced matters on August 22, 2007 and August 25, 2007, respectively. On August 4, 2007, MGE served data requests on the Staff seeking materials forming the basis for the Staff's allegations. Responses to these data requests will not be due until August 24, 2007.

6. Further, MGE has been participating in discussions with the Staff concerning the possibility of reaching a stipulation and agreement in regard to these matters. MGE believes that an agreement may be reached in the near future.

7. MGE seeks an extension of the dates by which it must respond to the Staff Report and Complaint so that it will have the benefit of the discovery to be

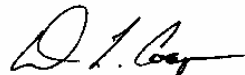
obtained from the Staff and so that settlement discussions may run their course.

Accordingly, MGE requests that these deadlines be extended until September 14, 2007.

8. Staff counsel has indicated that the Staff has no objection to the proposed consolidation and extension.

WHEREFORE, MGE requests a Commission order consolidating Cases Nos. GS-2007-0381 and GC-2008-0026, and extending MGE's deadlines for responding to the Staff Report and Complaint until September 14, 2007.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI GAS ENERGY

Certificate of Service

I hereby certify that on the 16th day of August, 2007, a true and correct copy of the above and foregoing *Entry of Appearance* was sent by electronic mail to the following:

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