

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

In the Matter of the Application of Missouri Gas	)	
Energy, a Division of Southern Union Company,	)	Case No. GE-2006-0301
for a Variance from the Provisions of the Affiliate	)	
Transaction Rule	)	

**MOTION FOR EXTENSION OF TIME TO  
RESPOND TO STAFF RESPONSE**

**COMES NOW** Missouri Gas Energy (“MGE”), a division of Southern Union Company, in accordance with Missouri Public Service Commission (“Commission”) Rule 4 CSR 240-2.080(15), and, as its Motion for Extension of Time to Respond, states as follows to the Commission:

1. On January 17, 2006, MGE filed an application for variance from Commission Rule 4 CSR 240-40.015, the natural gas affiliate transactions rule. This application concerned the possible performance of field repair services during company service calls.

2. On February 17, 2006, the Commission Staff filed its Response to Commission Order to File Recommendation. The Staff’s Response recommended that MGE withdraw its application for variance and resubmit its proposed Field Services Program in a tariff filing. This recommendation was based upon the Staff’s belief that the proposed program does not meet the definition of an affiliate transaction.

3. Commission Rule 4 CSR 240-2.080(15) states “Parties shall be allowed not more than ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission.”

4. Because of the press of other matters, MGE asks that the Commission allow it until March 20, 2006 (approximately thirty (30) days from the date of filing) to respond to the Staff’s Response. Such an extension would allow MGE to explore possible tariff language with

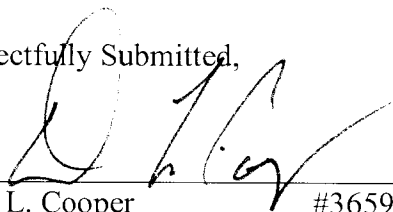
the Commission Staff and the Office of the Public Counsel, before taking a final position in regard to the Staff's recommendation.

5. Such an extension would provide for a more efficient consideration of the proposed program and would not prejudice any party.

6. Counsel for the Commission Staff and the Office of the Public Counsel have stated that they have no objection to the proposed extension.

WHEREFORE, MGE respectfully moves the Commission to allow it until March 20, 2006, to respond to the Staff's Response.

Respectfully Submitted,

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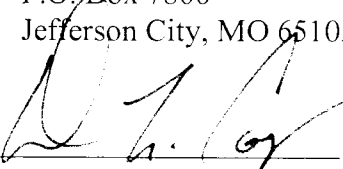
ATTORNEYS FOR MISSOURI GAS ENERGY, A  
DIVISION OF SOUTHERN UNION COMPANY

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 23<sup>rd</sup> day of February, 2006, to:

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