

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

In the Matter of Missouri Gas Energy and	)
Its Tariff Filing to Implement a General Rate	) Case No. GR-2009-0355
Increase for Natural Gas Service	) Tariff No. YG-2009-0714

**MOTION FOR EXTENSION OF REBUTTAL TESTIMONY FILING DATE**

Comes now Missouri Gas Energy (MGE or Company), a division of Southern Union Company, and, as its motion for an extension of the rebuttal testimony filing date, states as follows to the Missouri Public Service Commission (Commission):

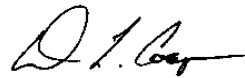
1. The Commission's Order Setting Procedural Schedule, dated May 27, 2009, directed, among other things, that the parties file rebuttal testimony by Friday, September 25, 2009.
2. The prehearing conference in this matter was scheduled from September 14-18, 2009. Meetings between the parties continued through Friday, September 18, 2009, and the parties circulated for comment an informal list of issues that remained in controversy late Friday, September 18, 2009. Parties provided comments in regard to the list through Monday, September 21, 2009.
3. This timing has left the parties with a fairly short period to write rebuttal testimony on the issues that remain in controversy. Accordingly, MGE requests that the Commission extend the date for the filing of rebuttal testimony until Monday, September 28, 2009 (essentially, an extension of one business day).
4. In conjunction with this request, MGE further requests that the time for responses to data requests set out in the Commission's Order Setting Procedural

Schedule be amended to provide that after the filing of rebuttal testimony, the response time for data requests becomes 7 calendar days to provide the requested information, and 5 calendar days to object or notify that more than 7 calendar days will be needed to provide the requested information.

5. Counsel for MGE has communicated with counsel for the other parties in regard to this motion and counsel for all other parties have stated that they have no objection to MGE's motion for extension.

WHEREFORE, MGE respectfully requests the Commission issue its order granting MGE's motion for an extension of the rebuttal testimony filing date, to include modification of the data request response time, as described herein.

Respectfully submitted,



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James C. Swearngen      Mo. Bar 21510  
Dean L. Cooper          Mo. Bar 36592  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102-0456  
Telephone: (573) 635-7166  
Facsimile: (573) 635-0427  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

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

## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 22<sup>nd</sup> day of September, 2009, to:

Lera Shemwell  
Missouri Public Service Commission  
Governor's Office Building  
200 Madison Street  
P.O. Box 360  
Jefferson City, Missouri 65102  
[Lera.shemwell@psc.mo.gov](mailto:Lera.shemwell@psc.mo.gov)

Stuart Conrad  
Finnegan, Conrad & Peterson, LC  
3100 Broadway, Suite 1209  
Kansas City, MO 64111  
[stucon@fcplaw.com](mailto:stucon@fcplaw.com)

William D. Steinmeier  
William D. Steinmeier, P.C.  
2031 Tower Drive  
P.O. Box 104595  
Jefferson City, MO 65110-4595  
[wds@wdspsc.com](mailto:wds@wdspsc.com)

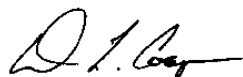
Charles W. Hatfield  
Stinson Morrison Hecker LLP  
230 West McCarty Street  
Jefferson City, MO 65101  
[chatfield@stinson.com](mailto:chatfield@stinson.com)

Marc Poston  
Governor's Office Building  
200 Madison Street  
P.O. Box 7800  
Jefferson City, Missouri 65102  
[marc.poston@ded.mo.gov](mailto:marc.poston@ded.mo.gov)

Jeremiah Finnegan  
Finnegan, Conrad & Peterson, LC  
3100 Broadway, Suite 1209  
Kansas City, MO 64111  
[jfinnegan@fcplaw.com](mailto:jfinnegan@fcplaw.com)

Sarah Mangelsdorf  
Shelley A. Woods  
Assistant Attorney General  
P.O. Box 899  
Jefferson City, Missouri 65102  
[sarah.mangelsdorf@ago.mo.gov](mailto:sarah.mangelsdorf@ago.mo.gov)  
[shelley.woods@ago.mo.gov](mailto:shelley.woods@ago.mo.gov)

Mark Comley  
Newman, Comley & Ruth P.C.  
P.O. Box 537  
Jefferson City, MO 65102  
[comleym@ncrpc.com](mailto:comleym@ncrpc.com)



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Dean L. Cooper