

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

In the matter of Missouri Gas Energy's)
Purchased Cost Adjustment Change.) Case No. GR-2008-0367

MGE'S MOTION FOR LEAVE

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 30, 2009, the Staff of the Commission filed a recommendation and memorandum indicating that Staff has reviewed the 2007-2008 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.

2. On January 4, 2010, the Commission issued its Order Directing Filing, wherein the Commission directed MGE to respond to Staff's recommendations by February 3, 2010.

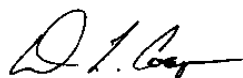
3. Because no previous filing in this case had been made by counsel for MGE, the Order was not served on MGE's counsel. Instead, MGE's chief operating officer received an EFIS notification. He assumed that a copy of the order had gone to counsel. As a result, MGE personnel responsible for preparing a response to the Staff recommendations were unaware of that the recommendation had been filed or that a time for response had been ordered.

4. MGE counsel and regulatory personnel became aware of this situation on February 4, 2010, and will work diligently to provide a response to the Staff recommendations. Because this matter is in its very early stages, MGE believes that this situation constitutes excusable neglect such that the Commission may allow for the filing of the response at a later date.

5. Accordingly, MGE requests the Commission's leave to file its response two weeks out of time, or by February 17, 2009. 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 leave to file its response to the Staff recommendation two weeks out of time, or by February 17, 2010.

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 4th day of February, 2010, to:

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