

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

In the Matter of Missouri Gas Energy's)
Tariffs to Implement a General Rate) Case No. GR-2004-0209
Increase for Natural Gas Service)

**MGE's RESPONSE TO STAFF'S RESPONSE TO MGE'S
MOTION FOR ADDITIONAL TIME TO FILE COST OF CAPITAL
REBUTTAL TESTIMONY**

Comes now Missouri Gas Energy, a division of Southern Union Company ("MGE"), by counsel, and for its Response to Staff's Response to MGE's Motion for Additional Time to File Cost of Capital Rebuttal Testimony, respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. The Staff's Response is somewhat contradictory. On the one hand, the Staff apparently opposes MGE's requested extension, but on the other hand the Staff proposes a similar extension which would encompass rebuttal testimony on all issues for all parties. The Staff also seems not to understand what is contemplated by the request. The request concerns the subject matter of cost of capital. It is not limited to any particular witness or witnesses. MGE is prepared to go forward and file its rebuttal testimony on all issues, except cost of capital, on the original May 20, 2004, due date as directed by the Commission.

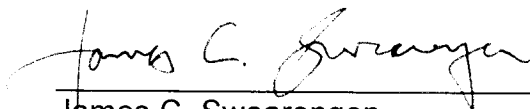
2. As an alternative, MGE has no objection to the Staff's apparent desire to extend the filing date for rebuttal testimony on all issues from May 20 to May 24, 2004, and to extend the filing date of surrebuttal testimony on all issues from June 9 to June 11, 2004. MGE assumes that any such extensions would apply to all parties. In

addition, MGE has no objection to all parties supplying workpapers in support of rebuttal and surrebuttal testimony within twenty-four (24) hours of the filing date as is the practice and custom. Finally, in spite of the fact that the Commission's rule concerning discovery, 4 CSR 240-2.090, permits a twenty (20) day time period for responses to data requests, unless otherwise agreed by the parties, MGE is agreeable to the Staff's suggestion regarding seven-day turnaround time by all parties on data requests related to rebuttal or surrebuttal testimony and will make its best efforts to respond to data requests submitted by the parties in response to MGE's rebuttal and surrebuttal testimony within seven (7) days.

WHEREFORE, MGE offers the foregoing response.

Respectfully submitted,

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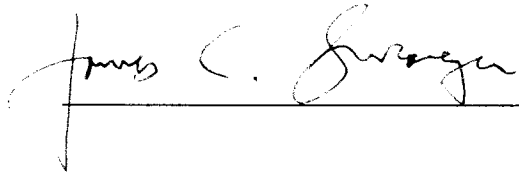


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ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, mailed by U.S. mail or electronically transmitted on this 17TH day of May, 2004, to all parties of record.

A handwritten signature in cursive script, reading "James C. Swager", is written over a horizontal line.