

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

In the Matter of the Application of Missouri Gas	)	
Energy's Application for a Determination of	)	Case No. GO-2002-48
Certain Matters Pertaining to its Safety Line	)	
Replacement Program.	)	

**MOTION FOR EXTENSION**

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

1. On December 22, 2005, the Commission issued its Order Approving Application to Amend Safety Line Replacement Program (Order) in this case. The Order, among other things, provided that MGE's Safety Line Replacement Program be "amended to provide that the company's obligation to replace the mains and service lines for the Finley River Mobile Home Park and for the Heistland Mobile Home Park is deferred from June 30, 2006, to June 30, 2008."

2. The Order further directed as follows: "[MGE] shall file annual leak survey reports, beginning on January 1, 2007, regarding the leak surveys it makes and any leaks it detects at the Finley River Mobile Home Park and the Heistland Mobile Home Park. The reports shall also indicate what progress is being made toward a resolution of the question of whether these parks will close or whether the mains and service lines will be replaced."

3. Prior to January 30, 2006, a letter was sent to all customers and owners of record at the Finley River Mobile Home Park in Ozark, Missouri and the Heistland Mobile Home Park (the Heistland Park is now known as the Malang Mobile Home Park) west of Joplin, informing them of the Commission Order allowing an extension of time from June 30, 2006 until June 30, 2008, to replace Mains and Services in the two parks.

4. As of August 2006, all gas meters were removed from the trailer park known as the Finley River Mobile Home Park in Ozark, Missouri. On September 8, 2006, MGE abandoned all gas lines serving the Finley River Mobile Home Park thus eliminating a need to replace the lines or to perform leak surveys on the lines in the Park.

5. The Heistland/Malang Park has continued to exist. MGE most recently filed a report concerning its leak surveys on January 14, 2008. Leak surveys were most recently conducted in the Heistland/Malang Park on March 6, 2007, August 23, 2007 and February 20, 2008. No leaks were detected during these surveys.

6. A current meter inventory at the Heistland/Malang Park reveals the following: 8 active meters; 2 inactive meters; and, 25 empty risers.

7. As was reported in MGE's 2008 Annual Leak Survey Report, the Heistland/Malang Trailer Park was sold by John Tullis to Kevin York on January 14, 2008. At the time of the Report filing, MGE had been unable to contact Mr. York to inquire as to his plans for the park. MGE indicated that depending upon what information was obtained, it might find it necessary to file an additional pleading concerning the extension that is the subject of this case.

8. When Mr. York was reached, it became apparent that he had no knowledge as to the possible elimination of customer-owned gas facilities or the shared costs associated with this elimination. Mr. York indicated that he has listed the property for sale, plans to sell the property within two or three years for commercial development and does not have plans to continue to operate the property as a mobile home park for an extended length of time.

9. The cost of the repiping that would be required to replace the customer-owned facilities at Heistland/Malang is currently estimated to be approximately \$30,000. The park

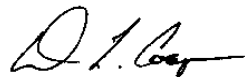
owner's share of this repiping cost would be approximately \$8,000. This cost will likely increase over time.

10. Repiping the Heistland/Malang Park at this time in light of its short period of expected use and limited number of customers does not appear to be a good use of either MGE or customer resources. Further, the leak surveys that have been conducted over the last two years have not found any frequent or continuing leak issues.

11. Accordingly, MGE would ask that the Commission extend the prior deadline for repiping the Heistland/Malang Park for two years, from June 30, 2008, to June 30, 2010. During the proposed extension period, MGE would continue to monitor the condition of the Park on the leak survey frequency established in the Order, promptly notify the Commission if any leaks are detected and continue to file annual reports with the Commission concerning the leak surveys.

WHEREFORE, MGE respectfully moves the Commission to extend the prior deadline for repiping the Heistland/Malang Park for two years, from June 30, 2008, to June 30, 2010.

Respectfully Submitted,



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ATTORNEYS FOR MISSOURI GAS ENERGY, A  
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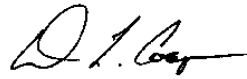
Certificate of Service

I hereby certify that two, true and correct copies of the above and foregoing document was sent by electronic mail, or by U.S. Mail, postage prepaid, on this 27<sup>th</sup> day of May, 2008, to:

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