

**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 THREE MONTH 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. On June 12, 2008, the Commission issued its Order Approving Extension of Time To Replace Mains and Service Lines at Malang Mobile Home Park. Therein, the Commission again amended MGE's Safety Line Replacement Program to provide that the company's obligation to replace the mains and service lines for the Malang Mobile Home Park (f/k/a Heistland Mobile Home Park) was deferred from June 30, 2008, to June 30, 2009.

6. The Heistland/Malang Park has continued to exist. Leak surveys have been conducted in a timely manner. No leaks were detected during these surveys.

7. A current meter inventory at the Heistland/Malang Park reveals the following: 7 active meters; 3 inactive meters; and, 22 empty risers.

8. The owner of the Malang Trailer Park, Mr. Kevin York, was provided copies of the various extension pleadings that were filed leading up to the June 12, 2008 Commission order. Further, MGE provided direct notice to Mr. York earlier this year by letter dated January 15, 2009 (**Appendix A**), in an attempt to bring Mr. York's attention to this matter and to again let him know that the need for action was imminent. Thereafter, MGE personnel have worked with Mr. York and the Staff for several months in an attempt to resolve this issue, at the least possible cost, prior to the June 30 deadline.

9. In the afternoon of Thursday, June 25, 2009, MGE personnel were finally informed by Mr. York that he did not want to participate in the replacement of the service lines

at Malang Trailer Park. Instead, he has indicated that he desires to convert his trailer park to all electric.

10. This conversion to electric service has not yet taken place or even begun and it is impossible for the conversion to take place by June 30, 2009. Mr. York estimates that he will be able to complete the conversion by the end of the year.

11. MGE is left with the choice of discontinuing service to the trailer park or requesting an extension of the June 30, 2009 deadline. MGE hereby requests extension.

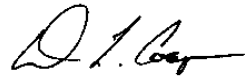
12. If a deadline is granted, MGE would suggest that such extension be no more than three months, or until September 30, 2009. If Mr. York fails to make the indicated conversion and MGE, and the Commission, are again forced to address the possible discontinuation of service to the trailer park, it would be better to do this at the end of September than at the end of December, when weather issues might drive a different result.

13. Accordingly, MGE would ask that the Commission extend the prior deadline for repiping the Malang Park for three months, from June 30, 2009, to September 30, 2009. During the proposed extension period, MGE would continue to monitor the condition of the Park on the leak survey frequency established in the prior 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 Malang Park for two years, from June 30, 2009, to September 30, 2009.

Respectfully Submitted,



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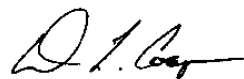
**Certificate of Service**

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 29<sup>th</sup> day of June, 2009, to:

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