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April 22, 2002

Mr. Dale Hardy Roberts Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Re: Missouri Gas Energy - Case No. GO-2002-48

Dear Mr. Roberts:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN

CHARLES E. SMARR

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of Missouri Gas Energy's Motion for Extension of Time. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

Clean L. Cooper by Ray

By:

Dean L. Cooper

DLC/rhg Enclosures

cc: Thomas R. Schwarz, Jr., PSC

Douglas E. Micheel, OPC

Douglas Field

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the matter of Missouri Gas Energy's)	
Application for determination of certain)	Case No. GO-2002-48
Matters pertaining to its Safety Line)	
Replacement program.)	

MISSOURI GAS ENERGY'S MOTION FOR EXTENSION OF TIME

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for its motion for extension of time respectfully states as follows:

- 1. MGE initiated this matter through the filing of an Application on or about July 30, 2001. The Staff of the Missouri Public Service Commission ("Staff") filed its recommendation herein on or about April 12, 2002.
- 2. MGE needs a little bit more time to study and discuss the Staff recommendation and prepare its response. MGE will file its response as soon as possible and in any event no later than May 6, 2002. MGE therefore respectfully requests an extension of time, until May 6, 2002, to file its response to the Staff recommendation.
- 3. Counsel for MGE has discussed the contents of the pleading with counsel for the Staff and the Office of the Public Counsel and no objection has been expressed.

Wherefore, MGE respectfully requests that the Commission issue its order granting an extension of time, until May 6, 2002, for the filing of MGE's response to

the Staff recommendation.

Respectfully submitted,

Robert J. Hack

MBE #36496

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ATTORNEY FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered this 22nd day of April, 2002, to:

Thomas R. Schwarz, Jr. Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 Douglas E. Micheel Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Douglas Field Senior Counsel Williams Gas Pipeline-Central P.O. Box 20008 3800 Frederica St. Owensboro, KY 42304 270/926-8686 270/683-5835

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