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April 12, 2002

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

FILED²
APR 12 2002
Missouri Public
Service Commission

Re: Case No. GR-2001-382

Dear Mr. Roberts:

Enclosed for filing on behalf of Missouri Gas Energy, please find an original and eight (8) copies of a Motion for Extension of Time and Suspension of Procedural Schedule.

Copies of this filing will be provided to all parties of record.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:


Dean L. Cooper

DLC/lar
Enclosure

cc: Doug Micheel
Thomas Schwarz, Jr.
Robert Hack
Jeffrey A. Keevil
Jim Deutsch/Henry Herschel

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

FILED²
APR 12 2002
Missouri Public
Service Commission

In the Matter of Missouri Gas Energy's)
Purchased Gas Adjustment tariff revisions to)
be Reviewed in Its 2000-2001 Actual Cost)
Adjustment)

Case No. GR-2001-382

**MOTION FOR EXTENSION OF TIME
AND SUSPENSION OF PROCEDURAL SCHEDULE**

Comes now Missouri Gas Energy (MGE), a division of Southern Union Company, in this matter, by and through its attorney, and asks the Commission to grant an extension of time for the filing of Staff's recommendation in this case until May 31, 2002, and for the suspension of the present procedural schedule. In support thereof, MGE respectfully states as follows:

1. Representatives of Staff, MGE and OPC have had recent discussions regarding the subject matter of this proceeding and related matters. MGE believes that a short delay in the scheduled filing of Staff's recommendation in this case may be beneficial from the standpoint of potentially eliminating some complex issues which otherwise would require lengthy litigation. The Staff's recommendation is presently due this date (April 12, 2002). To facilitate additional discussions and the exchange of additional information, MGE requests that the Commission allow the Staff additional time before its recommendation has to be filed.

2. MGE requests that the Staff be allowed an extension on the filing of the recommendation until May 31, 2002. In addition, MGE and the Staff have agreed that the Staff should file an update or status report in this case with the Commission on or

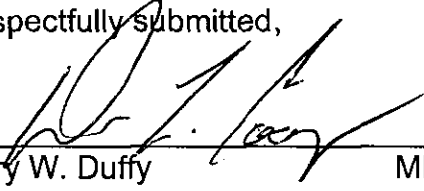
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before May 3, 2002, to give the Commission an indication of the status of the discussions.

3. Counsel for MGE has had discussions with counsel of record and understands that there is no objection to this motion.

WHEREFORE, MGE requests that the Commission issue an order suspending the procedural schedule in this case, order the Staff to file a status report in this case on or before May 3, 2002, and to file its recommendation in this case on or before May 31, 2002.

Respectfully submitted,



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ATTORNEYS FOR MISSOURI GAS ENERGY

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served this 12th day of April, 2002, by either hand delivery or placement of same with the United States Postal Service in Jefferson City, Missouri, first class postage prepaid, to the counsel listed below.



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