

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

In the Matter of Missouri Gas Energy's     )  
Tariff Sheets Designed to Increase         )  
Rates for Gas Service in the                )  
Company's Missouri Service Area            )

Case No. GR-2004-0209

**MOTION FOR LEAVE TO LATE-FILE SCHEDULES TO  
MGE WITNESS JOHN C. DUNN'S REBUTTAL TESTIMONY**

COMES NOW Missouri Gas Energy ("MGE"), a division of Southern Union Company, and requests leave to late-file two (2) schedules to the prepared Rebuttal Testimony filed by MGE witness John C. Dunn. In support thereof, MGE states as follows:

1. On May 24, 2004, MGE caused to be filed with the Commission in the captioned case, the prepared Rebuttal Testimony of John C. Dunn. It has come to MGE's attention recently that two (2) schedules were inadvertently omitted from the Rebuttal Testimony of Mr. Dunn that was filed on that date.

2. Attached hereto are copies of Rebuttal Schedules JCD-3 and JCD-4. By virtue of this filing, MGE seeks leave of the Missouri Public Service Commission ("Commission") to file the attached schedules and thereby to affix each of them to Mr. Dunn's prepared Rebuttal Testimony.

3. The filing of these schedules will not prejudice any party to this case. To the contrary, the schedules provide information referred to in Mr. Dunn's Rebuttal Testimony. Doing so will aid the Commission's understanding of the record.

WHEREFORE, for good cause shown, MGE requests leave of the Commission to late-file Rebuttal Schedules JCD-3 and JCD-4 to MGE witness John C. Dunn's prepared Rebuttal Testimony heretofore filed with the Commission in this case on Monday, May 24, 2004.

Respectfully submitted,

/s/ Paul Boudreau  
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Attorneys for Applicant, Southern Union  
Company d/b/a Missouri Gas Energy

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail or by hand delivery, on this 7<sup>th</sup> day of June 2004 to the following:

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