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June 16, 2003

Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GC-2003-0342

FILED³

JUN 16 2003

**Missouri Public
Service Commission**

Dear Sir:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of Missouri Gas Energy's Motion for Leave to Late-File; Answer And/Or Notice of Satisfaction of Complaint. 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.

By:

Dean L. Cooper

DLC/tli

Enclosures

cc: Thomas R. Schwarz, Jr.
Douglas E. Micheel
Kenneth B. Marbrie

FILED³

JUN 16 2003

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Kenneth B. Mabrie,)
Complainant,)
v.) Case No. GC-2003-0342
Missouri Gas Energy,)
Respondent.)

**MISSOURI GAS ENERGY'S MOTION FOR LEAVE TO LATE-FILE;
ANSWER AND/OR NOTICE OF SATISFACTION OF COMPLAINT**

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for its motion for leave to late-file; answer and/or notice of satisfaction of complaint respectfully states the following:

Motion to Late-File

1. This complaint was originally filed on or about March 20, 2003, with the named respondent erroneously identified as Missouri Public Service Co. MGE has been working with the Staff on this matter since late March through the filing of the Staff's Report (on April 24, 2003) and believed that it had been resolved. As a result of this belief, MGE did not timely file its answer and/or notice of satisfaction of complaint in compliance with the Notice of Complaint issued by the Commission on April 21, 2003. MGE regrets this omission and any resulting confusion or inconvenience and hereby requests leave to late-file its answer and/or notice of satisfaction of complaint.

Answer and/or Satisfaction of Complaint

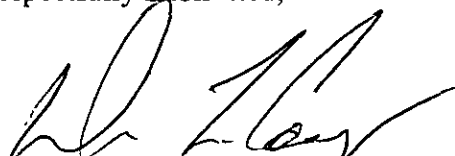
2. MGE generally denies the averments in the complaint.

3. The Staff's Report contains an accurate recitation of the facts related to this matter and MGE finds the Staff's recommendation acceptable. In fact, on May 28, 2003, MGE customer service personnel communicated to Mr. Mabrie MGE's willingness

to reduce the amount owed to \$304.80 and account number 0562057658 has been so noted. Based on the conversation between Mr. Mabrie and MGE's customer service personnel, MGE believes that Mr. Mabrie has no objection to this resolution aside from an inability to pay. In addition, MGE has been in the process of developing the cost study, called for the by the Staff's Report, justifying the additional labor charges and the investigative fee charged by MGE. MGE will provide this cost study to the Staff no later than July 15, 2003.

Wherefore, MGE respectfully requests that the Commission 1) grant it leave to late-file this answer and/or satisfaction of complaint; 2) permit Mr. Mabrie a reasonable amount of time to make a filing stating that this resolution is unsatisfactory; and, 3) if Mr. Mabrie makes no such filing or if Mr. Mabrie makes a filing concurring that this resolution is satisfactory, adopt the recommendations in the Staff's Report.

Respectfully Submitted,



Dean Cooper MBE #36592
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ATTORNEYS FOR MISSOURI
GAS ENERGY

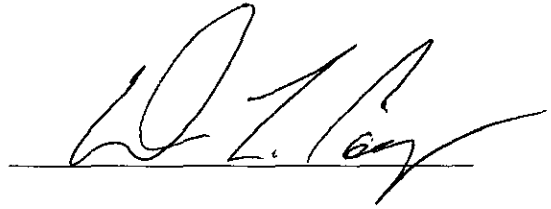
Certificate of Service

I hereby certify that a copy of the foregoing document was mailed or hand delivered this 16th day of June, 2003, 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

Kenneth B. Mabrie
8732 Tennessee
Kansas City, MO 64138

A handwritten signature in black ink, appearing to read "D. E. Micheel", is written over a horizontal line. The signature is stylized and cursive.