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FILED²

JUN 1 3 2003

Missouri Public Service Commission

June 13, 2003

VIA HAND DELIVERY

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

Re: Southern Union Company d/b/a Missouri Gas Energy

Case No. AO-2002-1156

Dear Mr. Roberts:

On behalf of Southern Union Company d/b/a Missouri Gas Energy, I deliver herewith an original and eight (8) copies of a <u>Motion for Additional Time Within Which to Further Advise the Commission</u>, for filing with the Commission in the referenced matter. I would appreciate it if you would see that copies are distributed to the appropriate Commission personnel. Service copies have been mailed or hand-delivered this date.

I have also enclosed an extra copy which I request that you stamp "Filed" and return to the person delivering them to you.

Thank you for your attention in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Paul A. Boudreau

PAB/ccp Enclosures

cc: All parties of record

FILED²
JUN 1 3 2003

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Missouri Public Service Commission

In the Matter of the Assessment Against the)	
Public Utilities in the State of Missouri for)	Case No. AO-2002-1156
the Expenses of the Commission for the)	
Fiscal Year Commencing July 1, 2002.)	

MOTION FOR ADDITIONAL TIME WITHIN WHICH TO FURTHER ADVISE THE COMMISSION

COMES NOW Southern Union Company d/b/a Missouri Gas Energy (hereinafter "Southern Union"), by and through the undersigned counsel, and for its request for additional time within which to report to the Commission, states as follows:

- 1. On May 14, 2003, the Commission issued its <u>Order Granting Intervention and Directing Filing</u> in the referenced case. The Commission has directed the parties of this case, jointly or separately, to file a pleading advising the Commission of the procedural posture of this case.
- 2. Southern Union requests that the Commission grant an additional fourteen (14) days until Wednesday, July 9, 2003 in which to comply with this directive. By this time, Southern Union hopes to have some definitive information about the state budget and the related appropriations bills, including additional information about any further "sweeps" of the Public Service Commission Fund. Because of the ongoing special session of the General Assembly that has been called by Governor Holden, that information is not yet final.
- 3. Also, the Commission is scheduled to begin issuing its public utility assessments for the fiscal year 2004 by the end of the month of June. Southern Union

desires to review this information, in addition to the budget information, to determine whether and how it may want to proceed with its Application for Rehearing in this case.

4. Southern Union submits that an additional fourteen (14) days within which to make the Commission's directed filing will not prejudice any proper party to the case.

WHEREFORE, for good cause shown, Southern Union requests an additional fourteen (14) days until Wednesday, July 9, 2003 in which to report to the Commission about the posture of this case.

Respectfully submitted,

Paul A. Boudreau

MO #33155

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(573) 635-7166

Attorneys for Applicant

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 13th day of June 2003 to the following:

Mr. Dana K. Joyce, General Counsel Missouri Public Service Commission 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102-0360

Mr. Paul G. Lane Southwestern Bell Telephone Company One SBC Center, Room 3520 St. Louis, MO 63101

Mr. Michael A. Rump, Senior Attorney Kansas City Power & Light Company 1201 Walnut Street, 20th Floor Kansas City, MO 64106

Mr. James M. Fischer Fischer & Dority, P.C. 101 Madison, Suite 400 Jefferson City, MO 65101 Ms. Ruth O'Neill Office of the Public Counsel 200 Madison Street, Suite 650 P.O. Box 7800 Jefferson City, MO 65102

Mr. Thomas M. Byrne Union Electric d/b/a AmerenUE 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149

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