

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

In the matter of the Application of )  
Missouri Gas Energy, a division of )  
Southern Union Company, for a certificate )  
of public convenience and necessity )  
authorizing it to construct, install, own, )  
operate, control, manage and maintain a )  
natural gas distribution system to provide )  
gas service in Carroll County, Missouri, )  
as an expansion of its existing certified )  
area.

**Case No. GA-2008-0281**

**MOTION TO RESET FILING DATE OF RECOMMENDATION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), and for its Motion to Reset Filing Date of Recommendation, states:

1. On February 25, 2008, Missouri Gas Energy, a division of Southern Union Company, (MGE) filed its Application requesting a certificate of convenience and necessity (CCN) to expand its existing service area to provide service to the Show Me Ethanol Plant in Carroll County, Missouri.

2. On March 25, 2008, the Commission issued its *Order Directing Staff to File Recommendation* no later than April 24, 2008.

3. However, MGE's Application is currently incomplete because it lacks a feasibility study as required under Commission Rule 4 CSR 240-3.205(1)(A)5. In paragraph 8 of its Application, MGE cited Commission Rule 4 CSR 240-3.205(2) informing the Commission "MGE will provide when it is available a feasibility study containing plans and specifications for the system cost of construction, plans for financing, proposed rates and charges and an estimate of the number of customers, revenues and expenses during the first three years of operations."

4. Because MGE is still conducting discussions with Show Me Ethanol Plant, MGE has been unable to submit its feasibility study. Accordingly, Staff is unable to review and analyze the Application and prepare its recommendation for the Commission. Moreover, a review of the feasibility study, once submitted, may require additional discovery. For these reasons, the Staff recommends the Commission issue an order directing Staff to file either a status report or recommendation within 30 days of Staff's receipt of MGE's feasibility study. Staff counsel has discussed this matter with MGE counsel, indicating MGE support for this motion. There are no intervenors in this case.

**WHEREFORE**, for the foregoing reasons, Staff requests the Commission issue an order setting aside its order directing Staff to file its recommendation no later than April 24, 2008, and directing Staff to file a status report or recommendation within 30 days of receiving MGE's feasibility study.

Respectfully submitted,

/s/ **Robert S. Berlin**

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 18th day of April 2008.

**Robert S. Berlin**