

Paras Madho  
Manager  
Securities Operations

New York Stock Exchange, Inc.  
20 Broad Street  
New York, NY 10005



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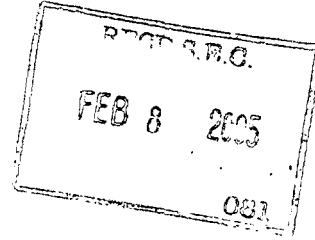
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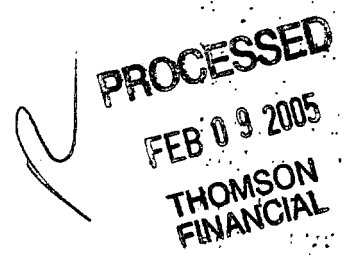


*Cert NYS*

February 8, 2005



Mr. Brian Johnson  
Branch Chief  
Securities and Exchange Commission  
Branch of Filer Support 2  
Room 1004 -- STOP/1-4  
450 Fifth Street, NW  
Judiciary Plaza  
Washington, DC 20549



Dear Mr. Johnson:

The New York Stock Exchange certifies approval for listing and registration under the Securities Exchange Act of 1934, SOUTHERN UNION COMPANY, Corporate Units and requests immediate acceleration of registration. Adequate distribution assured. Form 8-A received on February 8, 2005. Tentative listing date -- February 9, 2005.

Sincerely,

*Paras Madho*