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

The Staff of the Missouri Public Service Commission,	)
Complainant,	)
V.	Case No. GC-2016-0149
Missouri Gas Energy, an operating unit of Laclede Gas Company	) )
Respondent	)

## **MOTION FOR EXTENSION**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Extension* in this matter hereby states:

- 1. On February 26, 2016, the Commission issued its *Order Granting Motion* for Continuance, extending the submission deadline for Staff's Response to *Missouri Gas Energy's Motion for Summary Determination* to April 27, 2016, to allow for more time for Staff to conduct additional discovery.
- 2. Staff has conducted additional discovery and has reviewed a substantial amount of information, however, Staff believes additional discovery is still necessary. Additionally, the parties have discussed the status of the *Complaint*, and believe that it would be useful to further discuss the issues surrounding Staff's *Complaint*. MGE has indicated that it supports this Motion.

WHEREFORE, Staff respectfully requests that the Commission grant an extension of 30 days, extending the deadline for responding to *Missouri Gas Energy's Motion For Summary Determination* until May 27, 2016, to allow for Staff to conduct further discovery and provide the parties additional time to attempt to resolve the matter.

Respectfully Submitted,

## /s/ Mark Johnson

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Attorney for the Staff of the Missouri Public Service Commission

## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 26<sup>th</sup> day of April, 2016.

<u>|s| Mark Johnson</u>