

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

USW Local 11-6)	
)	
)	
v.)	Case No. GC-2006-0060
)	
Laclede Gas Company,)	
Respondent.)	

**USW LOCAL 11-6'S MOTION FOR EXTENSION OF TIME IN WHICH TO
SUBMIT WRITTEN TESTIMONY OF FIRE CHIEF ARNOLD**

COMES NOW USW Local 11-6 ("Local 11-6") and requests an extension of time of one business day in which to submit the written testimony of Pattonville Fire District Chief Robert Stephen Arnold, which is being filed concurrently. In support of this motion, Local 11-6 states as follows:

1. One round of written testimony in this matter was scheduled to be filed on Friday, May 5, 2006, with rebuttal and cross-examination to be presented live at the hearing.
2. USW 11-6 did not intend to present the testimony of Fire Chief Arnold as part of its case in chief.
3. USW 11-6 learned on May 5, 2006 that Fire Chief Arnold will not be available to testify on May 22-23, 2006 due to a professional commitment. Fire Chief Arnold requested at that time that he be permitted to submit written testimony instead.
4. USW 11-6 believes that Fire Chief Arnold's testimony is important and that the Commission will be interested in the viewpoint of a first-responder to gas fires and gas explosions.

5. USW 11-6 believes that Fire Chief Arnold will be reasonably available for deposition prior to the hearing. Accordingly, no party to this proceeding would be prejudiced by admitting Fire Chief Arnold's testimony one business day after the submission of other written testimony in this matter.

WHEREFORE, Local 11-6 prays that the Commission permit the contemporaneous filing of the testimony of Fire Chief Arnold and give that testimony full consideration in this matter.

Respectfully submitted,

/s/ Sherrie A. Schroder
Janine M. Martin, MBN 46465
Sherrie A. Schroder, MBN 40949
DIEKEMPER, HAMMOND, SHINNERS,
TURCOTTE and LARREW, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
jmartin@dhstl.com (E-mail)
saschroder@dhstl.com (E-mail)
Attorneys for USW Local 11-6

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on May 8, 2006, by United States mail, hand-delivery, email, or facsimile upon:

Marc Poston
Office of Public Counsel
marc.poston@ded.mo.gov

Tim Schwarz
Missouri Public Service Commission
Tim.Schwarz@psc.mo.gov

Michael C. Pendergast
Vice President—Associate General
Counsel of Laclede Gas Company
mpendergast@lacledegas.com

/s/ Sherrie A. Schroder