

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

In the Matter of the Office of the Public)		
Counsel's Complaint against Laclede Gas)	Case No.	GC-2016-0297
Company and Missouri Gas Energy)		
Addressing the Companies' Gas Rates)		

**MOTION TO LIFT STAY AND CONSOLIDATE
WITH THE COMPANIES' CURRENT RATE CASES**

COMES NOW the Office of the Public Counsel ("Public Counsel") and for its Motion to Consolidate respectfully states as follows:

1. On April 26, 2016, Public Counsel filed its Complaint against Laclede Gas Company ("Laclede") and Missouri Gas Energy ("MGE") (collectively both Laclede and MGE are referred to as "Companies").

2. Public Counsel filed its Complaint to address the issue of whether the Companies' gas rates were just and reasonable, and to request the Public Service Commission ("Commission") to revise the Companies' gas rates to be just and reasonable consistent with their respective costs of service and revenues.

3. On October 5, 2016, the Commission granted Public Counsel's Motion to Stay Proceedings pending the Companies' next general rate case, which Laclede planned to file in April of 2017.

4. On February 3, 2017, the Companies filed a Notice of Intended Case Filings, indicating their intent to file general rate cases by April 12, 2017. The Companies have since filed rate cases GR-2017-0215 and GR-2017-0216.

5. Public Counsel's Complaint and the Companies' rate cases GR-2017-0215 and GR-2017-0216 address the same issue, all seeking review of the Companies' revenue requirements and rates.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission to lift the stay in Case No. GC-2016-0297, and issue an Order consolidating this Complaint with the Companies' current rate cases GR-2017-0215 and GR-2017-0216 and designate the rates cases as the lead cases, allow use of all discovery obtained through the Complaint's proceedings, and for any other relief the Commission deems appropriate.

Respectfully submitted,

/s/ Hampton Williams

Hampton Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 31st day of July, 2017.

/s/ Hampton Williams