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

In the Matter of the PGA Filing for Laclede	)	Case No. GR-2004-0273
Gas Company.	)	

## STAFF'S RESPONSE TO MOTION TO MODIFY PROCEDURAL SCHEDULE

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its response to Laclede's Motion for Modification of Procedural Schedule states:

Staff does not object to Laclede's request to modify the dates for the List of Issues and Prehearing Brief, currently due November 29 and December 11, 2006, respectively. Staff agrees to revised dates of December 18, 2006, and January 11, 2007.

Staff objects to Laclede's request to extend the date for surrebuttal testimony, now due November 21, 2006. After surrebuttal is filed, the Staff will need to submit DR's to Laclede to explore the basis for the surrebuttal testimony and may choose to depose Laclede's witness, Mr. Godat, as soon as practicable after written discovery is concluded. If surrebuttal is extended to December 8, Staff will lose significant time required to review Laclede's surrebuttal, prepare Data Requests, await answers within twenty (20) days, deal with likely objections, and thereafter possibly depose Mr. Godat. The timeline for completion of necessary discovery is further complicated by the Holidays between now and January 29, 2007.

WHEREFORE, the Staff of the Commission respectfully requests that the Commission deny Laclede's request to extend the date for surrebuttal and grant the balance of the motion.

Respectfully submitted,

## /s/ Steven C. Reed

Steven C. Reed Litigation Counsel Missouri Bar No. 40616

Attorneys for the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-3015(Telephone) (573) 751-9285 (Fax) steven.reed@psc.mo.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed with first class postage, hand-delivered, transmitted by facsimile or electronic mail to all counsel and/or parties of record this this 20th day of November, 2006.

/s/ Steven C. Reed