

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

In the Matter of the Joint Application of)	
Southern Union Company d/b/a Missouri)	
Gas Energy, The Laclede Group, Inc., and)	
Laclede Gas Company for an Order)	
Authorizing the Sale, Transfer, and)	Case No. GM-2013-0254
Assignment of Certain Assets and)	
Liabilities from Southern Union Company)	
to Laclede Gas Company and, in)	
Connection Therewith, Certain other)	
Related Transactions)	

**PUBLIC COUNSEL’S RESPONSE TO
MGE’S MOTION FOR RECONSIDERATION**

COMES NOW the Missouri Office of the Public Counsel (OPC) and for its Response to Southern Union Company d/b/a Missouri Gas Energy’s (MGE) Motion for Reconsideration, respectfully states as follows:

1. OPC supports the Commission’s May 22, 2013 Order Granting the Application to Intervene Out of Time of the Missouri Industrial Energy Consumers (“Order”) because good cause exists to support intervention, as the Commission rightly determined when it concluded that “no procedural schedule has yet been established as the parties have been struggling with the interplay between this case and Laclede Gas Company’s rate case.” OPC further agrees with the Commission’s conclusion that granting intervention to the Missouri Industrial Energy Consumers’ (MIEC) “will not disrupt these proceedings.”

2. OPC, like Staff, has been focusing its resources on reviewing and researching issues in Laclede’s rate case, and has spent limited time reviewing and

researching issues regarding the proposed asset purchase. OPC is currently exploring possible new issues that have not yet been the subject of discovery or discussion among the parties. If the Commission approves the proposed procedural schedule filed by the parties on May 22, 2013, MIEC will be on equal footing with OPC and the other parties, and the discovery restrictions presented by the proposed procedural schedule will apply equally to MIEC. MGE will not be prejudiced by MIEC's participation in the case.

3. MIEC's intervention and participation in this case will provide the unique perspective of Laclede's largest gas users, a perspective that will not otherwise be present in the case since the Missouri Gas Users Association (MGUA) represents MGE's large gas users, and OPC represents all gas consumers generally with a focus upon the residential and small business gas consumers.

4. For these reasons, OPC supports the Commission's Order and urges the Commission to deny MGE's Motion for Reconsideration.

WHEREFORE, the Office of the Public Counsel respectfully offers this reply to MGE's Motion for Reconsideration.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 23rd day of May 2013.

/s/ Marc Poston
