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

In the Matter of Missouri Gas Energy, Inc.'s	)	
Filing of Revised Tariffs to Increase its Annual	)	Case No. GR-2014-0007
Revenues for Natural Gas	)	

## STAFF STATEMENT DESCRIBING DISCOVERY CONCERN

**COMES NOW** the Staff (Staff) of the Missouri Public Service Commission (Commission), by and through counsel, and respectfully submits the following statement of discovery concerns pursuant to Section 5(B) of the Procedural Schedule:

- 1. On November 13, 2013, the Commission issued its *Order Adopting Recommended Procedural Schedule*, which adopted the *Recommendation of The Parties Regarding Procedural Schedule* and set a Discovery Conference for January 8, 2014.
  - 2. Paragraph 5(B) of the *Procedural Schedule* provides:

Not less than two (2) business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved.

- 3. Staff's discovery concern involves concerns related to documents in the possession of Southern Union.
- 4. **WHEREFORE**, Staff submits this statement and requests a discovery conference be held February 5, 2014, pursuant to Paragraph 5 of the *Recommendation* of the Parties Regarding Procedural Schedule.

Respectfully Submitted,

## STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

/s/ John D. Borgmeyer

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## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this  $3^{rd}$  day of February, 2014.

/s/ John D. Borgmeyer