

**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 ) **Case No. GM-2013-0254**  
Group, Inc., and Laclede Gas Company for an Order )  
Authorizing the Sale, Transfer, and Assignment of )  
Certain Assets and Liabilities from Southern Union )  
Company to Laclede Gas Company and, in Connection )  
Therewith, Certain other Related Transactions )

**STAFF RESPONSE TO LACLEDE GAS COMPANY’S MOTION FOR LEAVE TO  
ENTER INTO CERTAIN INTEREST RATE SWAP AGREEMENTS AND  
FOR EXPEDITED APPROVAL**

**COMES NOW** the Staff of the Commission, by and through counsel, and, pursuant to the Commission’s February 4, 2013 *Order Establishing Time To Respond To Laclede Gas Company’s Motion For Leave To Enter Into Certain Interest Rate Swap Agreements* (Order), states as follows:

1. On February 4, 2013, Laclede filed a motion asking the Commission to grant it leave to enter into interest rate swap agreements to effectively lock in interest rates for its proposed purchase of Southern Union Company’s Missouri Gas Energy division (MGE) and moved for expedited approval (Motion).
2. That same day the Commission issued its Order directing the Staff to respond to Laclede’s Motion no later than February 11, 2013.
3. The Staff has reviewed Laclede’s Motion and has discussed the relief sought by the company with Laclede.
4. The Staff is not opposed to the specific relief sought by Laclede in its Motion and is not opposed to its expedited approval. Staff continues, however, to reserve its rights to take whatever position it believes is appropriate on the proposed

transaction and whatever position it believes is appropriate on any costs related to the transaction in the next general rate case proceeding.

**WHEREFORE**, Staff prays the Commission accept its Response as directed by the Commission's February 4, 2013 Order.

Respectfully submitted,

**/s/ Robert S. Berlin**

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Senior Counsel  
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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 11<sup>th</sup> day of February, 2013.

**/s/ Robert S. Berlin**