

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

In the Matter of the Application of Southern)
Union Company d/b/a Missouri Gas Energy,)
The Laclede Group, Inc. and Laclede Gas Company)
for an Order Authorizing 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)

JOINT MOTION FOR EXTENSION OF TIME

COME NOW Southern Union Company d/b/a Missouri Gas Energy (“SUG”), the Laclede Group, Inc. (“LG”), Laclede Gas Company (“Laclede Gas”) and the Staff of the Missouri Public Service Commission (“Staff”) (sometime hereafter, collectively “Movants”) and for their motion to the Missouri Public Service Commission (“Commission”) state the following:

1. On April 22, 2013, the Commission issued an Order Further Extending Time to File Proposed Procedural Schedule (“Order”). The Order contained a directive that parties file a proposed procedural schedule by not later than April 29, 2013. Complying with this requirement has been complicated by the fact that Laclede Gas has a rate case pending¹ and a procedural schedule already in place in that case setting forth filing and other obligations calculated to address the operation of law day associated with the proposed rate schedules.

2. With this in mind, representatives of the Movants met on the afternoon of Friday, April 26th to discuss the interplay between this case and the rate case and the parameters of a possible comprehensive settlement of the rate case. A settlement of the rate case would enable members of Staff now working on that matter to focus more of their attention on a review of the Joint Application in this case. This will allow Staff to consider a more expeditious procedural schedule in this proceeding than otherwise would be the case. In that regard, Laclede Gas will

¹ Case No. GR-2013-0171.

immediately move forward with a specific proposal to resolve the rate case.

3. Movants request that the Commission grant some reasonable additional time for Laclede Gas, Staff and other parties to Case No. GR-2013-0171 to explore possible settlement of the rate case proceeding and, also, to discuss procedural mechanisms which would enable both cases to be dealt with in a coordinated, timely and productive manner. A short, additional two week extension of the deadline for filing a procedural schedule in this case would be helpful in facilitating this process.

4. Movants are mindful of the Commission's desire as articulated in the Order to move matters along in this case. This request for additional time is not for purposes of delay but, rather, to explore means which, if successful, may expedite the resolution of both cases.

WHEREFORE, Movants request that the Commission extend the time for parties to file a procedural schedule in this case by two weeks until May 13, 2013, for good cause shown.

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail on this 29th day of April 2013, to the following:

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