

**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 Assignment of) Case No. GM-2013-0254
Certain Assets and Liabilities from Southern Union)
Company to Laclede Gas Company and, in connection)
therewith, certain other Related Transactions)

JOINT MOTION TO SUSPEND PROCEDURAL SCHEDULE

COME NOW Southern Union Company, d/b/a Missouri Gas Energy (“SUG”), Laclede Group, Inc. (“LG”), and Laclede Gas Company (“Laclede”), and jointly state as follows to the Missouri Public Service Commission (“Commission”):

1. An agreement in principle in this case has been reached among SUG, LG, Laclede, the Staff of the Missouri Public Service Commission, the Office of the Public Counsel, the City of Kansas City, Missouri, Midwest Gas Users Association, the Missouri Department of Natural Resources and IBEW Local Union No. 53 which would resolve all outstanding matters in this case. Kansas City Power & Light, KCP&L Greater Missouri and Steelworkers District 11 AFL-CIO have not indicated agreement in principle at this time. All parties, however, have indicated no opposition to the relief requested herein. Accordingly, SUG, LG and Laclede, request that the procedural schedule in this matter be suspended pending the filing of a stipulation and agreement and that all parties be relieved from all requirements pursuant to the ordered procedural schedule as modified or expanded by subsequent orders.

2. The parties will file a stipulation and agreement with the Commission by July 2, 2013, at the latest. As set forth below, the parties intend to request that the Commission issue an order approving such agreement as a resolution of the joint applicants’ application in this case.

3. If desired by the Commission the parties will file a proposed order for the Commission's consideration and will be available for the Commission's agenda meeting or for an on-the-record presentation.

4. In order to permit the most economical issuance of the debt necessary to finance the acquisition, SUG, LG and Laclede hereby request that the Commission issue its order approving the parties' stipulation and agreement at the agenda meeting to be held on July 17, 2013 with such order becoming effective by July 31, 2013 with approval for Laclede to close on the requested purchase effective as of September 1, 2013, subject to the provisions of the Purchase and Sale Agreement and Southern Union's unilateral right to waive the condition of simultaneous closing of the transaction with Laclede Gas and the sale of its New England assets to Plaza Massachusetts Corp.

WHEREFORE, the movants respectfully request that the Commission suspend the procedural schedule in this matter pending filing of a stipulation and agreement resolving all issues in this case. The movants also request that the Commission take into consideration the other plans and intentions communicated herein for the ultimate purpose of obtaining Commission approval of such agreement.

Respectfully submitted,

/s/ Todd J. Jacobs

Todd J. Jacobs MBE#52366
Senior Director- Legal
Southern Union Company d/b/a Missouri Gas Energy
3420 Broadway
Kansas City, MO 64111
816-360-5976
816-360-5903 (fax)
Todd.Jacobs@SUG.com

/s/ Michael C. Pendergast

Michael C. Pendergast, Mo. Bar #31763
Vice President and Associate General Counsel
Rick Zucker, Mo. Bar #49211
Assistant General Counsel - Regulatory
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
Telephone: (314) 342-0532
Fax: (314) 421-1979
Email: mpendergast@lacledegas.com
 rzucker@lacledegas.com

/s/ James C. Swearengen

James C. Swearengen MBE#21510
Paul A. Boudreau MBE#33155
BRYDON, SWEARENGEN &
ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
(573) 635-7166
(573) 635-3847 facsimile
lrackers@brydonlaw.com
paulb@brydonlaw.com

ATTORNEYS FOR SOUTHERN UNION COMPANY
d/b/a MISSOURI GAS ENERGY, THE LACLEDE
GROUP AND LACLEDE GAS COMPANY

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 27th day of June, 2013, to the following:

Marc Poston
Office of the Public Counsel
opcservice@ded.mo.gov
marc.poston@ded.mo.gov

Michael E. Amash
Blake &Uhlig
mea@blake-uhlig.com

Jeremy Knee
Counsel
Missouri Attorney General's Office
jeremy.knee@ago.mo.gov

Sherrie Hall
Michael A. Evans
Hammond and Shinnars, P.C.
sahall@hammondshinnars.com

Roger W. Steiner
Corporate Counsel
Kansas City Power & Light Company
Roger.steiner@kcpl.com
Tim.Rush@kcpl.com

Stuart W. Conrad
Finnegan, Conrad & Peterson, L.C.
stucon@fcplaw.com

Mark Comley
Newman, Comley & Ruth, P.C.
comleym@ncrpc.com

Bob Berlin
Staff of the Missouri Public Service
Commission
bob.berlin@psc.mo.gov

/s/ James C. Swearengen