## STATE OF MISSOURI PUBLIC SERVICE COMMISSION

In the matter of	)	
USW Local 11-6,	) (	GC-2006-0390
and	)	
Laclede Gas Company	)	

## MOTION FOR LEAVE TO FILE TESTIMONY OUT OF TIME

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and hereby files its Motion for Leave to File Testimony Out of Time. In support of this Motion, Local 11-6 states as follows:

- 1. Local 11-6's written testimony was due on September 26, 2006.
- 2. However, Mary Hall contacted counsel for Local 11-6 on October 13, 2006.
- 3. Mary Hall's testimony is relevant to the above-captioned case.
- 4. At this time, the deadline to rebut Local 11-6's testimony is November 8, 2006. Additionally, trial is set for December 11-12, 2006. However, Local 11-6 is not opposed to giving the other parties additional time to respond to Mary Hall's testimony. Accordingly, no party will be prejudiced if this motion is granted.
  - 5. Mary Hall's testimony is attached to this Motion.

**WHEREFORE,** Local 1106 respectfully requests leave to file Mary Hall's testimony out of time.

## Respectfully submitted,

/s/ Sherrie A. Schroder
SHERRIE A. SCHRODER, MBN 40949
JANINE M. MARTIN, MBN 46465
HAMMOND, SHINNERS, TURCOTTE
LARREW AND YOUNG, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
saschroder@hstly.com (E-mail)
jmartin@hstly.com (E-mail)

Attorneys for USW Local 11-6

## **Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on October 23, 2006, by United States mail, hand-deliver, email, or facsimile upon:

General Counsel Office
Missouri Public Service Commission
GenCounsel@psc.mo.gov

Lewis Mills Office of Public Counsel opcservice@ded.mo.gov

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

Robert Franson Missouri Public Service Commission robert.franson@psc.mo.gov

Michael C. Pendergast Vice President – Associate General Counsel of Laclede Gas Company mpendergast@lacledegas.com

Rick Zucker Laclede Gas Company rzucker@lacledegas.com

/s/ Sherrie A. Schroder