BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Staff of the Missouri Public Service Commission,))
Complainant,))
VS.) Case No. GC-2014-0216
Laclede Gas Company, doing business as Missouri Gas Energy,)))
and)
Southern Union Company, formerly doing business as Missouri Gas Energy)))
Respondents.	<i>)</i>

MOTION TO SUSPEND PROCEDURAL SCHEDULE

COME NOW Laclede Gas Company, doing business as Missouri Gas Energy ("MGE"), the Staff of the Missouri Public Service Commission ("Staff"), and Panhandle Eastern Pipeline Company, LP, successor in interest to Southern Union Company ("SUG/Panhandle") (collectively "the undersigned Parties"), and submit this *Motion to Suspend Procedural Schedule*. In support thereof, the undersigned Parties state as follows:

1. As indicated by status reports previously filed in this proceeding, the undersigned Parties and the Office of the Public Counsel ("OPC") have been meeting over the past several months in an effort to discuss and potentially resolve the outstanding issues in this case, including the development of measures responsive to the recommendations made by Staff in the above referenced Complaint.

detailed conceptual agreement, which if approved by the Commission, would resolve all outstanding issues in this case. The undersigned Parties have drafted a *Stipulation*

As a result of those discussions, the undersigned Parties have reached a

and Agreement that fully reflects their conceptual understandings. To afford the

Commission an opportunity to consider it, the Parties request that the Commission

suspend the procedural schedule in this case. It is anticipated that such Stipulation and

Agreement will be filed on February 6, 2015 or shortly thereafter.

2.

3. Although the undersigned Parties to this case concur in the suspension of

the procedural schedule for the reasons stated herein, they also recommend that the

Commission preserve the existing May hearing dates previously established in this case

pending the Commission's disposition of the Stipulation and Agreement.

4. The undersigned Parties have been advised by counsel for OPC that OPC

has no objection to the relief requested in this motion.

WHEREFORE, for the foregoing reasons, the undersigned Parties respectfully

request that the Commission suspend the procedural schedule pending the filing and

Commission consideration of a Stipulation and Agreement that, if approved, by the

Commission, would resolve all remaining issues in this case.

Respectfully submitted,

LACLEDE GAS COMPANY

/s/ Rick Zucker

Rick Zucker, Mo. Bar 49221 Associate General Counsel – Regulatory Laclede Gas Company 720 Olive Street, Room 1520

St. Louis, MO 63101

Telephone: 314.342.0533 Facsimile: 314.421.1979

2

rzucker@lacledegas.com

STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

/s/ Kevin A. Thompson__

Kevin A. Thompson
Chief Staff Counsel
Missouri Bar No. 36288
John D. Borgmeyer
Deputy Staff Counsel
Missouri Bar No. 61992
P. O. Box 360
Jefferson City, MO 65102
573) 751-6514 (Telephone)
(573) 526-6969 (Fax)
kevin.thompson@psc.mo.gov
john.borgmeyer@psc.mo.gov
Attorneys for the Staff of the
Missouri Public Service Commission

PANHANDLE EASTERN PIPELINE COMPANY, successor in interest to SOUTHERN UNION COMPANY

/S/ Dean L. Cooper

Dean L. Cooper Mo. Bar 36592 Diana C. Carter Mo. Bar 50527 Brydon, Swearengen & England P.C. 312 East Capitol Avenue P.O. Box 456 Jefferson City, MO 65102-0456 573-635-7166 (phone) 573-634-7431 (fax) Email: dcooper@brydonlaw.com

Certificate of Service

I hereby certify that copies of the above and foregoing document were sent by electronic mail on this 5th day of February, 2015 to counsel of record.

/s/ Marcia Spangler