

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. Due to his mother's serious illness, Glen Haley was not able to review and sign his testimony until October 25, 2006.
3. Glen Haley'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 Glen Haley's testimony. Accordingly, no party will be prejudiced if this motion is granted.
5. Glen Haley's testimony is attached to this Motion.

WHEREFORE, Local 1106 respectfully requests leave to file Glen Haley'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)

martin@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