BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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 Certain Assets and Liabilities from Southern Union Company to Laclede Gas Company and, in Connection Therewith, Certain other Related Transactions

Case No. GM-2013-0254

MOTION

COMES 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 and for their Motion to the Missouri Public Service Commission ("Commission") state as follows:

1. On February 14, 2013 the Commission issued its Order Scheduling a Technical Conference and Directing the Parties to File a Proposed Procedural Schedule in which the Commission scheduled a Technical Conference for 1:00 p.m. on March 18, 2013 and directed the parties to file a proposed Procedural Schedule no later than March 22, 2013.

2. The Technical Conference was held as scheduled and the participating parties exchanged information and engaged in substantive discussions with regard to subject Joint Application. The undersigned parties are of the opinion that pending further discovery, exchange of information and discussions that it is premature to recommend the establishment of a Procedural Schedule at this time. 3. Accordingly, the undersigned parties respectfully request that the Commission issue its order establishing Monday, April 15, 2013, as the date on or before which the parties shall file either a proposed Procedural Schedule or a Status Report.

4. The other parties to this proceeding have either indicated support of or no opposition to the relief requested by this Motion.

WHEREFORE, the undersigned parties move the Commission for the relief requested in paragraph 3 supra.

Respectfully submitted,

/s/ Todd J. Jacobs

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<u>/s/ Michael C. Pendergast</u>

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/s/_James C. Swearengen_

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

/s/Robert S. Berlin_

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 21st day of March 2013.

/s/James C. Swearengen_